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Department of Community Affairs, Aeronautics Division, Box 1698, Helena, MT 59601
Department of Fish, Wildlife, and Parks, Attn: Jim Posewitz, Administrator,
Ecological Services Division, Helena, MT 59601
Department of Fish, Wildlife, and Parks, Administrator, Recreation and Parks,
Helena, MT 59601
Department of State Lands, Office of the Commissioner, Helena, MT 59601
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Room 2, Helena, MT 59601
U.S. Department of the Interior, U.S. Geological Survey; MS-1-4, Chief,
Environmental Impact Assessment Program, Reston, VA 22092
U.S. Department of the Interior, Bureau of Mines, Chief, Western Field Operation
Center, East 315 Montgomery, Spokane, WA 99207
U.S. Department of the Interior, District Chief, Water Resources Division, U.S.
Geological Survey, Box 1696, Helena, MT 59601
U.S. Department of the Interior, Fish & Wildlife Service, Regional Director,
Region G, Box 25486, Denver Federal Center, Denver, CO 80226
U.S. Department of the Interior, Bureau of Reclamation, Regional Director,
Region UM, Box 2553, Federal Office Building, Billings, MT 59103
U.S. Department of the Interior, Bureau of Outdoor Recreation, Regional Director,
Mid-Continent Region, Box 25387, Building 41, Denver Federal Center, Denver,
CO 80225
U.S. Department of the Interior, National Park Service, Regional Director,
Rocky Mountain Region, Box 25287, 655 Parfet Avenue, Denver, CO 80215
U.S. Department of the Interior, Missouri River Basin, Special Assistant to the
Secretary, Room 688, Building 67, Denver Federal Center, Denver, CO 80225
Environmental Protection Agency, Deputy Regional Administrator, Region VIII,
Suite 900, 1860 Lincoln Street, Denver, CO 80203
Federal Housing Administration, Housing and Urban Development, Office of the
Director, 616 Helena Avenue, Helena, MT 59601
Bureau of Land Management, Montana State Office, Box 39157, Billings, MT 59107
Department of the Army, Omaha District Corps of Engineers, 7410 U.S. Post Office
and Courthouse, Omaha, NE 68102
U.S. Department of Transportation, Federal Highway Administration, 301 S. Park
Street, Federal Office Building, Drawer 10056, Helena, MT 59601
Areawide Planning Organization, Gus Byrum, Director City-County Building, Helena,
MT 59601
City of Helena, Office of the Mayor, Helena, MT 59601

Montana State Library



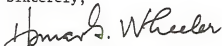
3 0864 1006 3805 8

State Clearinghouse, Office of Budget & Program Planning, Capitol Post Office,
Helena, MT 59601
Board of County Commissioners, Lewis and Clark County Courthouse, Helena, MT 59601
Montana Automobile Association, Box 4129, Helena, MT 59601
Montana Stockgrowers Association, Box 1679, First National Bank Building, Helena,
MT 59601
University of Montana, Attn: Dee Taylor, Department of Anthropology, Missoula,
MT 59801
Montana State University, Attn: Dr. A. P. Samson, Department of Anthropology,
Bozeman, MT 59715
Montana State University, Institute of Applied Research, Bozeman, MT 59715
Rick Graetz, Box 894, Helena, MT 59601
Friends of the Earth, Attn: Ed Dobson, Box 882, Billings, MT 59103
Sierra Club, Upper Missouri Group, Attn: Jack Schmidt, Box 515, Helena, MT 59601
The Wilderness Society, 4260 East Evans Avenue, Denver, CO 80222
Helena Chamber of Commerce, 201 E. Lyndale Avenue, Helena, MT 59601
The Montana Power Company, 40 East Broadway, Butte, MT 59701
Mountain Bell Telephone Company, Incorporated, Attn: F. R. Ketron, Plant
Supervisor, Box 1716, Helena, MT 59601
Lewis and Clark Library, 120 S. Last Chance Mall, Helena, MT 59601
Robert Murdo, Attorney, 203 N. Ewing, Helena, MT 59601
Douglas Buchi, Capital Hill Shopping Center, Suite 100, Helena, MT 59601
Patrick Melby, Attorney, Diamond Block Building, Helena, MT 59601
Steve Brown, Attorney, 1400 Eleventh Avenue, Helena, MT 59601

Reviewer:

The enclosed final environmental impact statement has been prepared for the Capital Hill Shopping Center Expansion in Lewis and Clark County. This impact is submitted for your consideration. The Department of Highways will take no action toward approval of the driveway approach application sooner than 30 days after the date of transmittal. Comments may be sent to: Les R. Reichelt, Department of Highways, 2701 Prospect Avenue, Helena, MT 59601.

Sincerely,



Homer G. Wheeler, P.E.
Assistant Administrator
Engineering Division
Department of Highways
Helena, Montana 59601

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MONTANA DEPARTMENT OF HIGHWAYS
FINAL ENVIRONMENTAL IMPACT STATEMENTS
CAPITAL HILL SHOPPING CENTER EXPANSION

Pursuant to the Montana Environmental Policy Act, Section 69-6504 (b) (3), Administrative Rules of Montana 16-2.2(2)-P2000 et. seq. and 18-2.2(2)-P210 et. seq., the final environmental impact statement (EIS) was prepared by the Montana Department of Highways (DOH) concerning a driveway approach permit pursuant to Department of Highways - Powers and Duties, Title 60, Chapter 2, Part 2, MCA.

I. DESCRIPTION

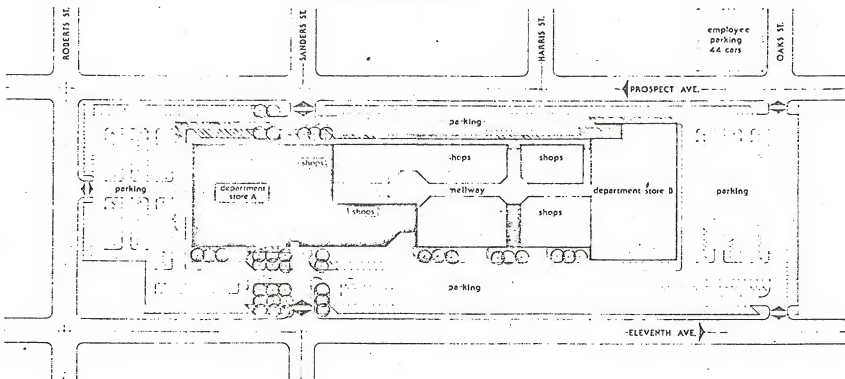
Clark Financial Corporation from Salt Lake City, Utah, propose to expand their Capital Hill Shopping Center. Expansion will involve the closing of Sanders Street to through traffic, reducing the number of road approaches in the vicinity of Oakes Street, and expanding the present shopping center. The major expansion would be to the west of the vacated Albertsons store but would involve all of the area between Eleventh and Prospect Avenue from Oakes Street to Roberts Street in some degree, with the exception of the Hal Wheat office building. The proposed expansion would add 109,960 square feet of floor area to the existing 120,600 square feet (Figure 1).

At least three "concepts" have been studied by Clark Financial Corporation. The plan presented in this Final Environmental Impact Statement (FEIS) is "Concept 1". Even though this may not be the final design, it is the largest of the expansion plans and would produce the most impact. The FEIS is therefore intended to cover any expansion concept that would produce similar or fewer impacts than Concept 1.

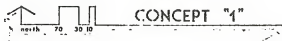
II REFERENCED MATERIAL

The DOH herewith references all materials in the draft EIS. Also additional information has been collected since the draft EIS was completed. This information is presented in Appendix B.

FIGURE NO. 1



department store "A"	83,000 s.f.
department store "B"	44,500 s.f.
shops - existing	76,400 s.f.
new	26,960 s.f.
total GLA	230,560 s.f.
enclosed mall	17,000 s.f.
total GBA	247,560 s.f.
parking capacity 1000 s.f. GLA = 1570	
20% small cars	= 306
80% large cars	= 1216
total land	595,675 s.f.
total building (site cover)	206,560 s.f.
landscaped area	35,750 s.f.

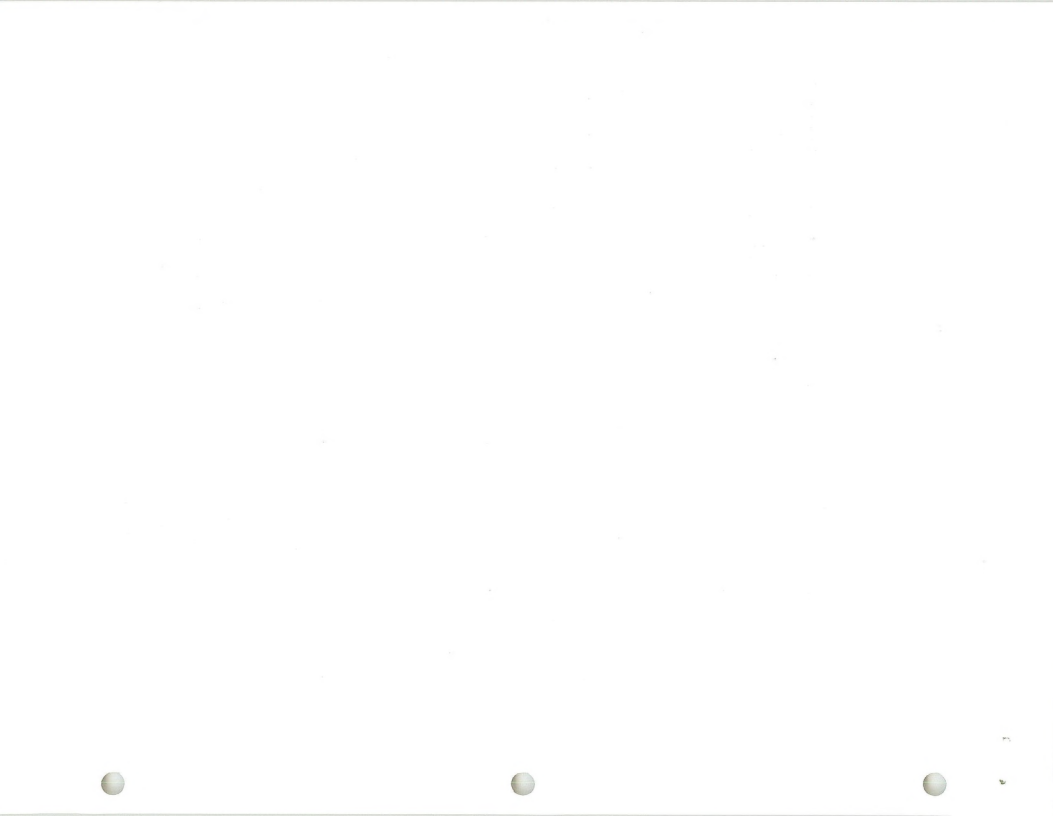


CONCEPT "1"

- ☐ existing
- ☒ new construction

CAPITAL HILL SHOPPING CENTER
HELENA, MONTANA
DEVELOPERS: CLARK FINANCIAL CORP.
SALT LAKE CITY, UTAH

RICHARD I. SHOE
ARCHITECTS & PLANNERS
HELENA, MONTANA



III. SUMMARY OF MAJOR CONCLUSIONS AND SUPPORTING INFORMATION

After analyzing all data presented, it is concluded that the proposed shopping center expansion will not cause any significant environmental impacts. The most identifiable effect of the proposed expansion will be on the traffic volumes and patterns. Although intersections in the immediate area will be more congested during peak hours, certain mitigating measures will be undertaken and therefore there should not be any significant traffic related problems resulting from the expansion.

IV. ADDITIONAL INFORMATION

Before the developer can proceed with any expansion plans, the City must issue a conditional use permit. Before the permit is issued, the City requires certain information. Since the type of information the City requested was not included in the draft EIS, an additional report was funded by the developers and prepared by Robert Peccia and Associates for the City. This report is presented in Appendix B.

V. ALTERNATIVE ACTION AVAILABLE TO THE DEPARTMENT OF HIGHWAYS

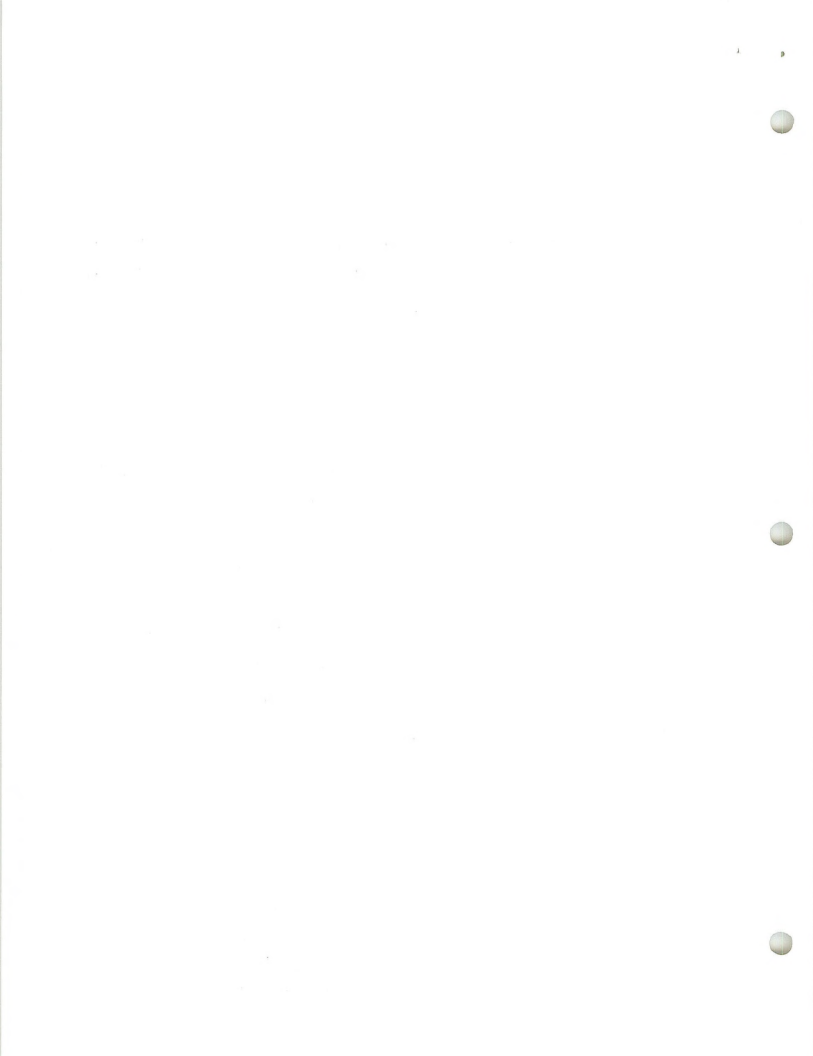
1. The Department of Highways could choose to deny the road approach application. - - - Under this alternate the Department would recognize the rights of an abutting landowner to have reasonable access to a public road facility unless those rights have been purchased. Capital Hill Mall does now enjoy reasonable access from 11th Avenue and Prospect Avenue via Sanders Street, Oakes Street, and two road approaches just west of Oakes Street. There are no plans or desire to acquire access rights.



A denial of a road approach application would cause the road approaches to remain as is. There would be no loss of access; however, there would be no reduction in the number of access points and, therefore, no reduction in the number of conflicts and potential conflicts that occur with each turning movement to and from 11th or Prospect. This would be less safe. The internal traffic flow and proposed parking arrangements would be disrupted to a minor degree. Also, arrangements would be required between the Department of Highways and the developer to assure the funding of the necessary improvements described in item 2 below due to the closure of Sanders, since the Department would have no "vehicle" to require improvements.

2. The Department of Highways could choose to accept the application and permit without the changes proposed by the developer and without further modification or improvement of existing traffic control devices (i.e. The signs and pavement markings on 11th and Sanders plus the signals presently at Sanders on 11th and on Prospect). If traffic projections and analysis in the Peccia Report hold true there will be a need for new and/or modified traffic control devices, such as signals on Roberts at 11th Avenue, and at Prospect, possible removable or modification of the existing signals on Sanders and 11th and at Prospect and the accompanying changes in signs and pavement markings, as well as improvements needed to the road approaches.

Selection of this alternate would require a separate agreement between the Department of Highways and the developer to assure funding of necessary improvements.



3. The Department could approve the road approach applications with certain conditions.--- The conditions would be as described under Item 2 above wherein the developer would fund the costs involved in modifying, installing and/or improving the traffic control devices associated with the development as a whole and with the road approach changes in particular. The developer has indicated he will fund the necessary improvements in traffic control devices directly attributable to the expansion of Capital Hill Shopping Center.

VI. FINAL RECOMMENDATION

It is hereby recommended the Department of Highways approve the developer's Driveway Approach Application and Permit, with the conditions that he fund the necessary changes, improvements and additions in traffic control devices (including necessary adjustments in the access points) that are attributable to the expansion of Capital Hill Shopping Center.

And further; since the City has jurisdiction of Roberts and Sanders Streets, that any proposal for widening, improving, changing, modifying or closing etc. be coordinated with adjacent landowners affected by such action and approved by the City.

VII. LIST OF COMMENTORS

The following is a list of agencies, organizations, or individuals that responded to the draft EIS.

U.S. Department of the Interior, Bureau of Mines, Spokane, WA
U.S. Department of the Interior, National Park Service, Rocky Mountain Region, Denver, CO
U.S. Department of Transportation, Federal Aviation Administration, Rocky Mountain Region, Aurora, CO
Department of the Army, Omaha District, Corps of Engineers, Omaha, NE
Department of Fish, Wildlife, and Parks, Parks Division, Helena, MT



Each of the above respondents either had "no comment" or stated the proposal would not affect them. Each of the following respondents had comments. These are addressed in the following chapter.

U.S. Department of Transportation, Federal Highway Administration,
Montana Division, Helena, MT
Steve Brown, Attorney, Helena, MT
City of Helena, Office of the Mayor, Helena, MT



United States Department of the Interior

BUREAU OF MINES

EAST 315 MONTGOMERY AVENUE
SPOKANE, WASHINGTON 99207

November 9, 1979

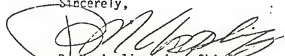
VII. LETTERS AND RESPONSES

Mr. Les R. Reichelt
Department of Highways
2701 Prospect Avenue
Helena, MT 59601

Dear Mr. Reichelt:

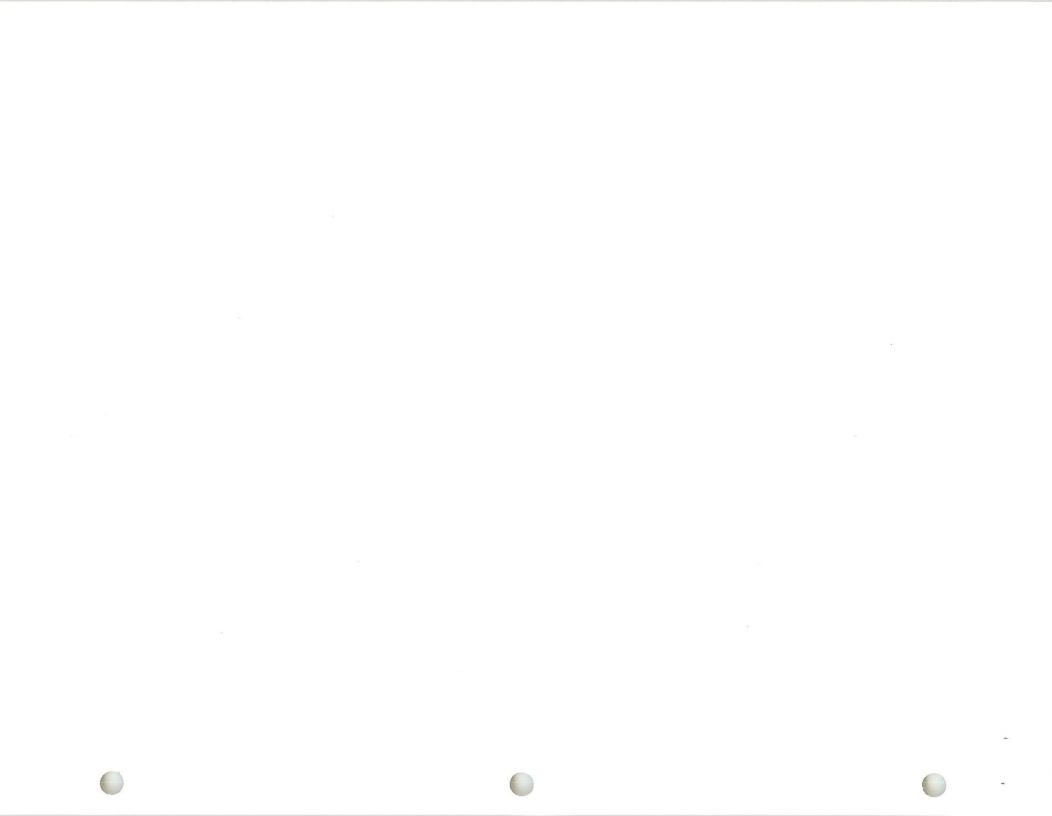
We have reviewed your draft environmental impact statement pertaining to the proposed expansion of Capital Hill Shopping Center. Inasmuch as the proposed expansion would be in an existing urban area, we anticipate no adverse impact to mineral resource availability.

Sincerely,



R. N. Appling, Jr., Chief
Western Field Operations Center

Thank you for your response.





United States Department of the Interior

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

VII. LETTERS AND RESPONSES

PLEASE REFER TO:

L7621 (RMR)PC

24 OCT 1979

Mr. Les R. Reichelt
Department of Highways
2701 Prospect Avenue
Helena, Montana 59601

Dear Mr. Reichelt:

The National Park Service has reviewed the draft environmental impact statement for the proposed expansion of Capital Hill Shopping Center in Helena, Montana. Since no units of the National Park System will be affected by this proposal, we offer no comment.

Sincerely yours,

Richard A. Strait
Associate Regional Director
Planning and Resource Preservation

Thank you for your response.



Save Energy and You Serve America!

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

ROCKY MOUNTAIN REGION
10455 EAST 25TH AVENUE
AURORA, COLORADO 80010



VII. LETTERS AND RESPONSES

November 28, 1979

Mr. Les R. Reickelt
Department of Highways
2701 Prospect Avenue
Helena, Montana 59601

Dear Mr. Reickelt:

We have reviewed your draft environmental impact statement (EIS) on the proposed Capitol Hill Shopping Center and do not foresee any impact on aviation or its activities.

Also, we do not anticipate any impact on aviation as the result of your reconstruction of Secondary Route 302 in Yellowstone County. However, we do wish to comment on your DEIS when it becomes available.

In your future distribution of draft and environmental impact statements, please mail them to:

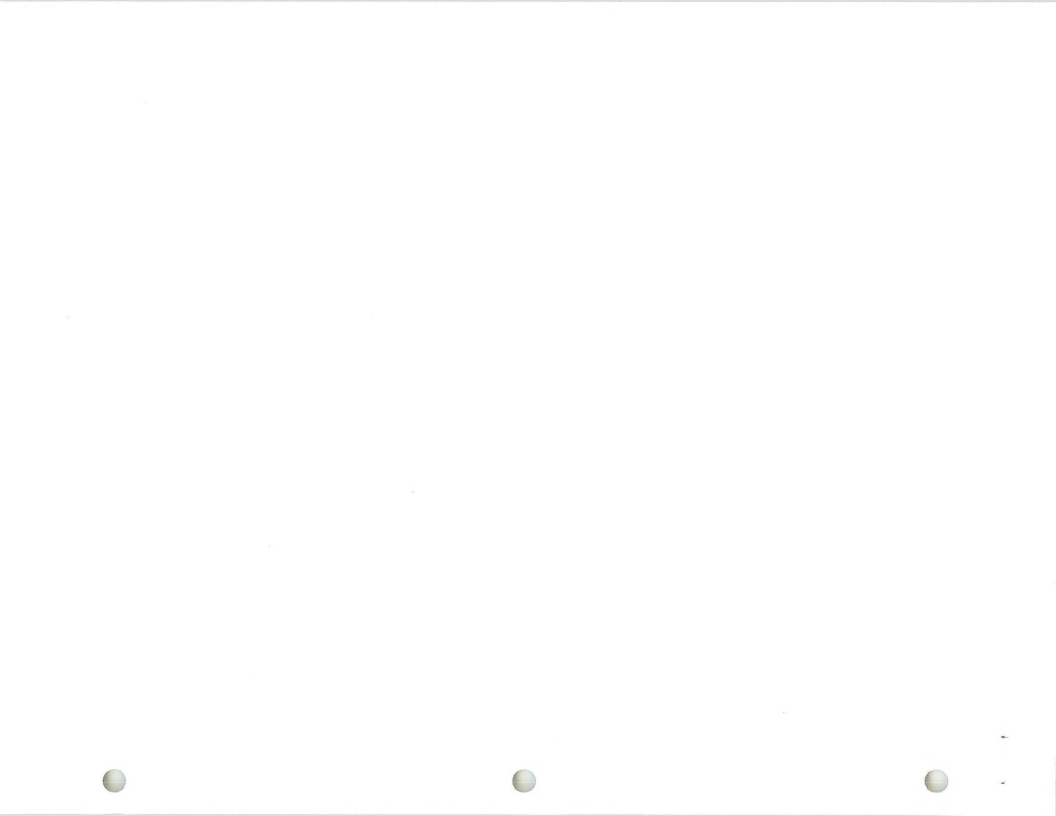
U. S. Department of Transportation
Federal Aviation Administration
Regional Director
10455 E. 25th Avenue
Aurora, Colorado 80010

Thank you for the opportunity to review your DEIS on the proposed shopping center project.

Sincerely,

EDWARD G. TATUM
Chief, Planning Staff

Thank you for your response.





DEPARTMENT OF THE ARMY
OMAHA DISTRICT, CORPS OF ENGINEERS
6012 U.S. POST OFFICE AND COURT HOUSE
OMAHA, NEBRASKA 68102

VII. LETTERS AND RESPONSES

25 October 1979

MROPD-A

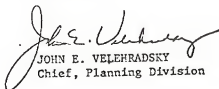
Mr. Les R. Reichelt
Department of Highways
2701 Prospect Avenue
Helena, MT 59601

Dear Mr. Reichelt:

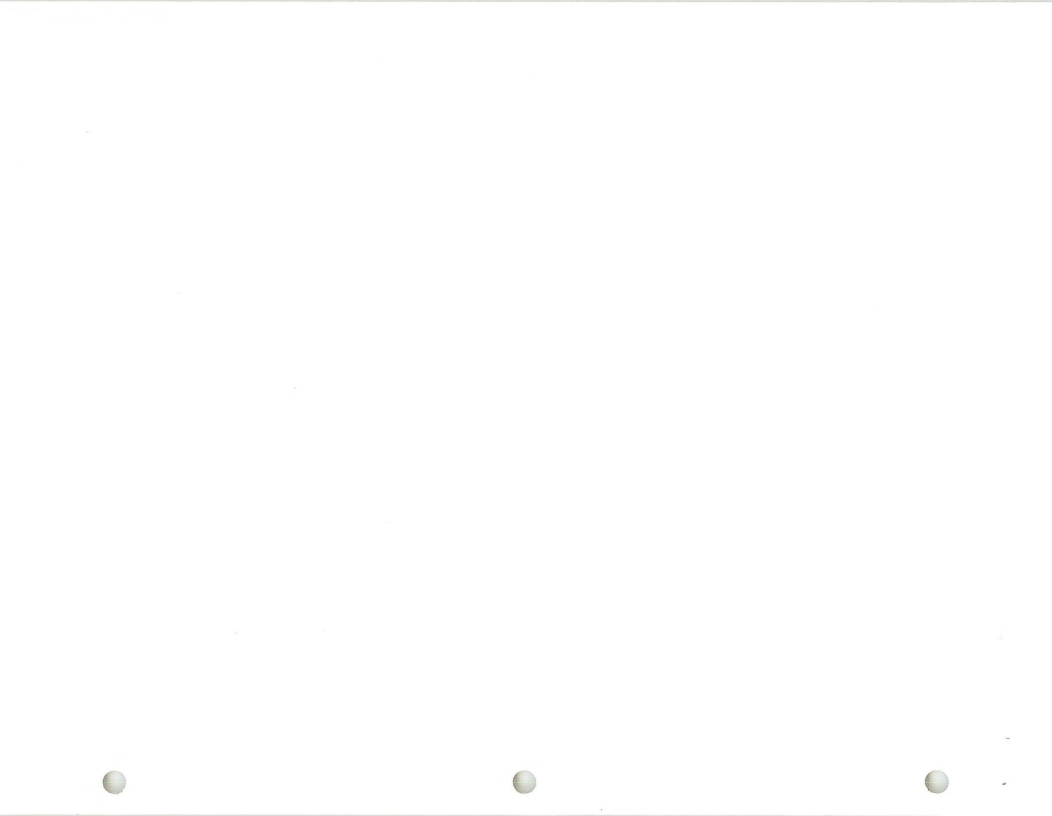
We have reviewed your Draft Environmental Impact Statement and wish to inform you that the project will have no impact on any existing or proposed projects nor does it come under the purview of any U.S. Army Corps of Engineers regulations or laws.

We thank you for the opportunity of reviewing your report.

Sincerely,


JOHN E. VELEHRADSKY
Chief, Planning Division

Thank you for your response.



STATE OF MONTANA

DEPARTMENT OF FISH AND GAME

VII. LETTERS AND RESPONSES

Helena, MT 59601
October 23, 1979

Mr. Les R. Reichelt
Department of Highways
2701 Prospect Avenue
Helena, MT 59601

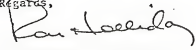
Mr. Reichelt:

I am writing in response to your request for comments on the proposed expansion of Capital Hill Shopping Center and the subsequent vacation of Sanders Street.

The Parks Division of the Department of Fish, Wildlife and Parks has no comments to make at this point. Our comments pertain only to the Parks Division. Other Divisions within our Department may possibly have comments they wish to make.

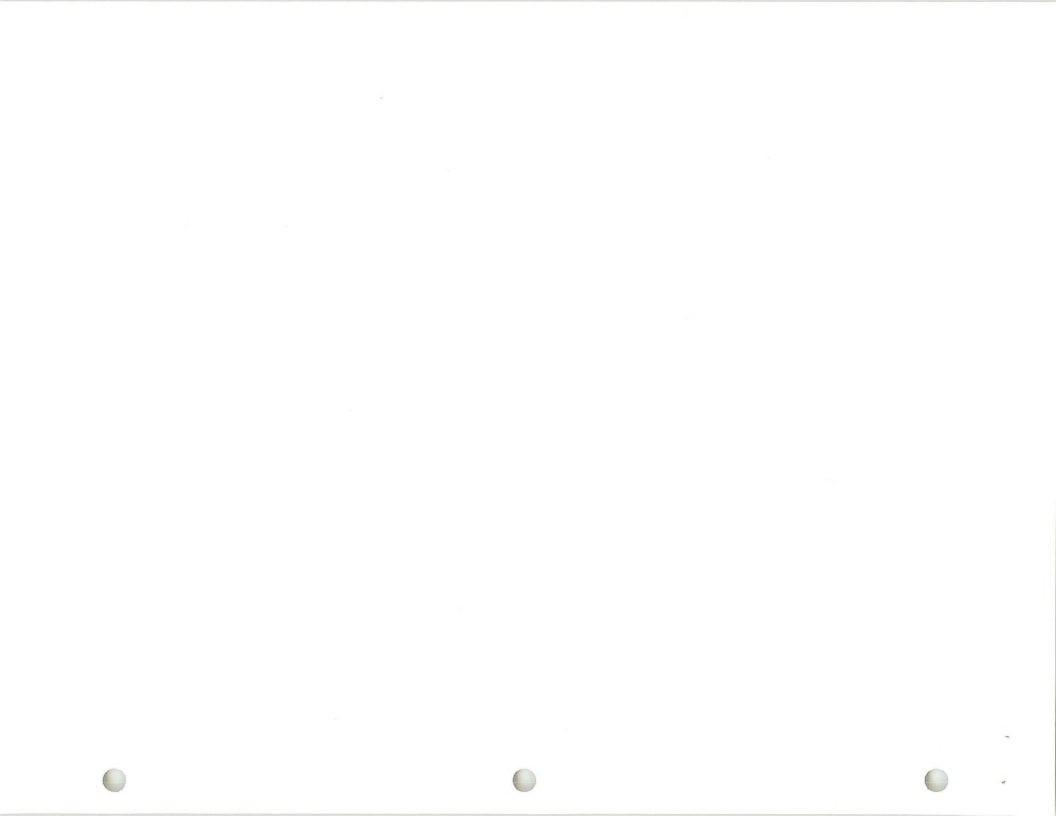
Thank you for the opportunity to comment.

Regards,


RON HOLLIDAY, Administrator
Parks Division

RH:sue

Thank you for your response.





U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION FIVE
Montana Division
Federal Office Building
301 S. Park, Drawer 10056
Helena, Montana 59601

RECEIVED

NOV 21 1979

HELENA, MONTANA
Mr. Ronald P. Richards, Director
Montana Department of Highways
Helena, Montana 59601

Gentlemen:

Subject: Draft EIS Capitol Hill Shopping Center
Expansion

We have reviewed the subject DEIS transmitted by your letter of October 12, 1979.

The evaluation of the probable impact on traffic patterns and volumes is rather weak. There seems to be considerable comment on the effect of the proposed expansion on internal movements within the shopping center but very little on the increased volumes on the Federal-aid system and the Capitol Complex Long Range Development Plan that utilizes Sanders as an arterial.

The consideration of alternatives is minimal. The alternative of expanding the mall without the closure of Sanders Street should have been considered. Elevated or at-grade walkways could provide satisfactory pedestrian access while permitting vehicular travel on Sanders with far less impact on existing streets and intersections. What is the future for the shopping center without the street closure?

It is our feeling that the air quality impacts would be far greater than the impacts addressed in the DEIS. This view is based upon the negative effect of intersections operating at a low level of service and large parking lots where cold starts are important factors.

Sincerely yours,

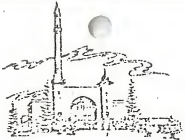
W S Dunbar
N. N. Stewart
Division Administrator

November 21, 1979
HEB-WT

VII. LETTERS AND RESPONSES

1. The draft EIS referenced the traffic and utility study completed by Robert Peccia and Associates. This report answers the question regarding traffic by going into greater detail concerning the increased traffic volumes and changes in traffic patterns (Chapters IV and VI in the Peccia report).
2. Alternate proposals were discussed by the developer in various City meetings prior to the presentation of the final proposal upon which the draft EIS was based. This plan was the one acceptable to most parties concerned.
3. Reference the air quality discussion in Appendix B.





City of Helena OFFICE OF THE MAYOR

November 1, 1979

Mr. Ronald P. Richards,
Director of Highways
Department of Highways
State of Montana
2701 Prospect Avenue
Helena, Montana 59601

Dear Mr. Richards:

The City of Helena appreciates the opportunity to review and comment on the draft EIS of the proposed expansion of the Capital Hill Shopping Center and related vacation of Sanders Street.

Attached are the comments of our staff review team regarding what we consider to be deficiencies in the draft EIS. The development of this information is critical for our discussion and consideration of the conditional use permit pending on this project.

There are three areas of concern about the DEIS. First, we feel there is a lack of quantifiable data throughout the report. Secondly, the effects of the proposal are not adequately addressed. The repercussions of the development on the physical, economic and social environment must be better detailed. Finally, the recommendations in the DEIS as to how to address the project's impacts are insufficient. In the areas of storm drainage, water, sewer and traffic, the report's recommendations are too vague to provide adequate direction for policy makers.

My hope is that your office will respond to these comments in a timely fashion. It is in the developer's interest as well as our own to complete this decision-making process as rapidly as possible.

Mr. Dave Ashley, Acting City Manager, will be contacting you to establish a meeting date to discuss the items I've mentioned. I also feel it would be advantageous to have a representative of the developer present at the meeting. I hope these issues can be satisfactorily resolved.

Sincerely,

Kathleen Ramey
Kathleen Ramey
MAYOR

KR/js
cc: Mr. Doug Buchi
Mr. Les Reichelt

VII. LETTERS AND RESPONSES

The comments submitted by the city are included in Appendix A. The cities concerns were addressed in a supplemental report prepared by Robert Peccia and Associates. This report is attached as Appendix B.



GARRITY, KEEGAN & BROWN

DONALD A. GARRITY
THOMAS W. KEEGAN
G. STEVEN BROWN

ATTORNEYS AT LAW
1000 ELEVENTH AVENUE
HELENA, MONTANA 59601

AREA CODE 406
TELEPHONE 442-8711

November 9, 1979

VII. LETTERS AND RESPONSES

Mr. Les R. Reichelt
Department of Highways
2701 Prospect Avenue
Helena, Mt. 59601

Dear Mr. Reichelt:

I take this opportunity to submit the following comments on behalf of Mr. Hal Wheat. Mr. Wheat is the owner of the Capital View Office Building, located at the corner of Roberts and 11th Avenue. The attached report was prepared for Mr. Wheat by Mr. Clete Daily, P.E., of Helena. I concur in the recommendations made by Mr. Daily and recommend that any approval of street alteration plans for the expansion of the Capital Hill Shopping Center include his recommendations as part of the decision.

Thank you for the opportunity to comment on the draft EIS.

Sincerely,

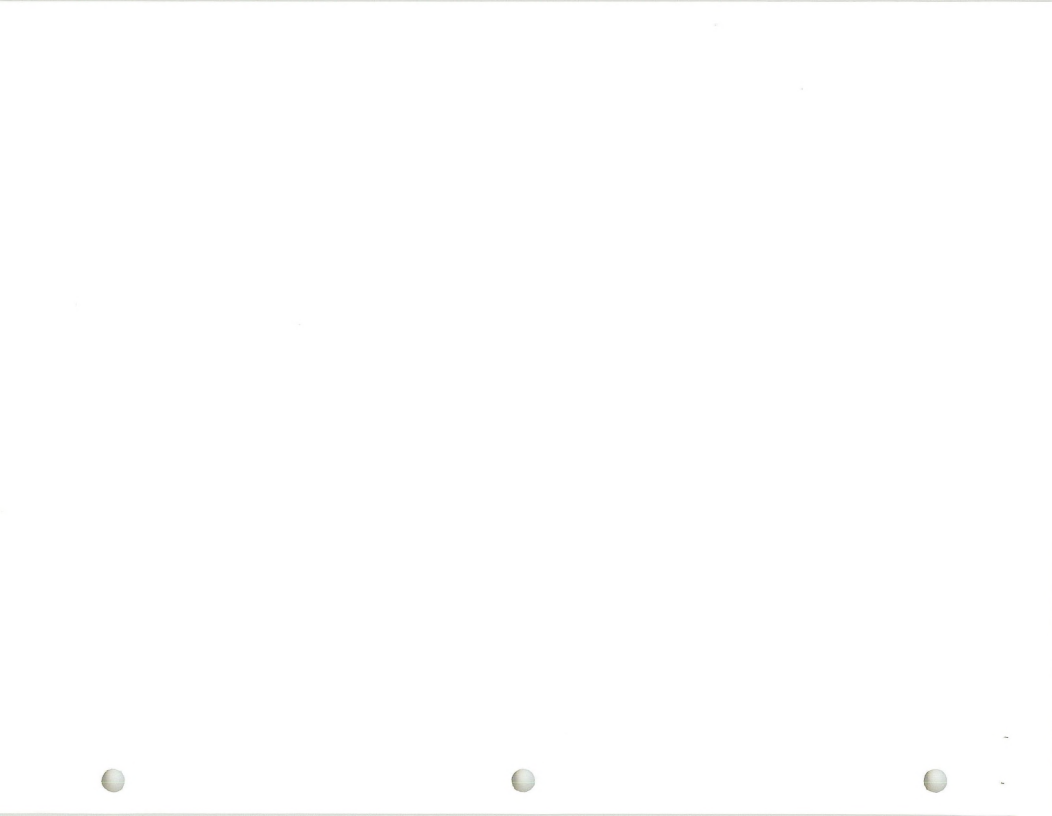
GARRITY, KEEGAN & BROWN



G. Steven Brown

GSB rs
encl.
cc: Hal Wheat

1. The attachment to this letter is included in Appendix C. Access to the Capital View Office Building will be modified somewhat but not cut-off. Internal parking may pose some problems; however, this is an existing condition that is heightened by the proposal. It is our understanding that representatives of the Wheat interests have met or intend to meet with the shopping center developers in order to resolve the access and parking questions.



IX PERSONS RESPONSIBLE FOR WRITING AND DISTRIBUTING
ENVIRONMENTAL IMPACT STATEMENT

Les R. Reichelt - Environmental Studies Coordinator

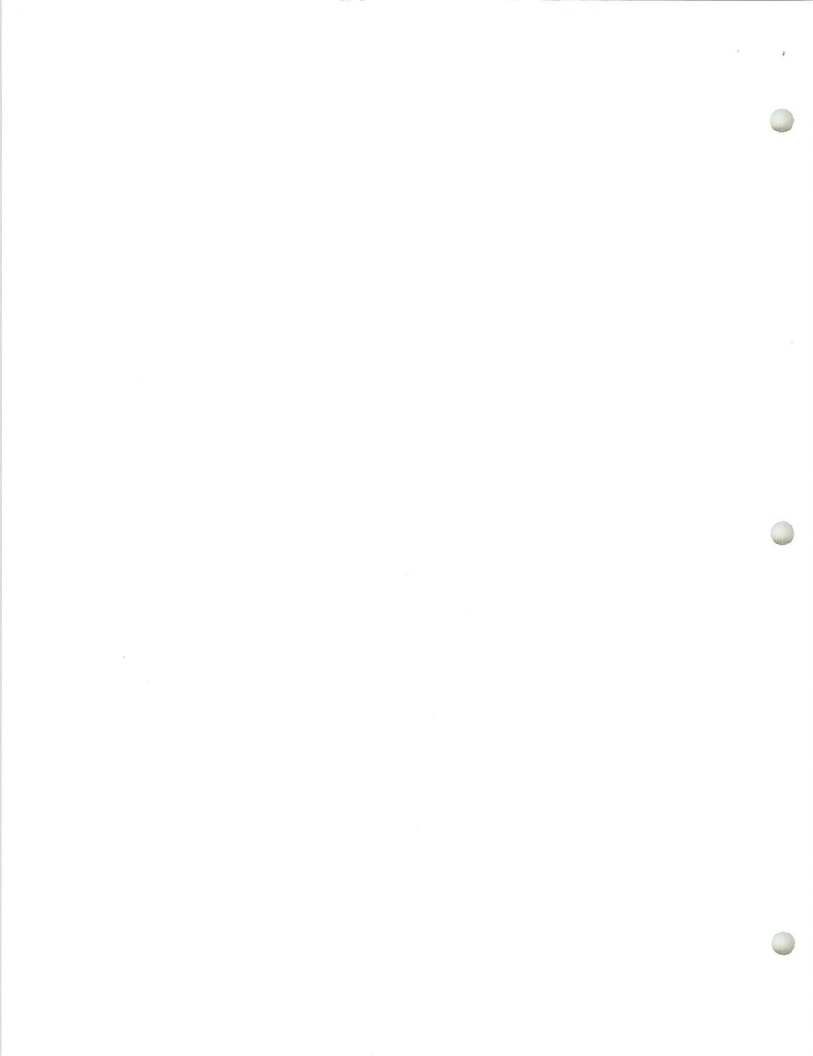
B.S./M.S. Fish and Wildlife Management, six years experience in environmental assessment.

Homer G. Wheeler, P.E., - Assistant Administrator of the MDOH Engineering Division B.S. Civil Engineering, Responsible for MDOH subdivision review and response activities, Impact Evaluation Coordinator for the MDOH's project development and evaluation process for over 5 years.



Appendix A

Comments Received From The City of Helena



COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
ON CAPITAL HILL SHOPPING CENTER
FROM THE CITY OF HELENA

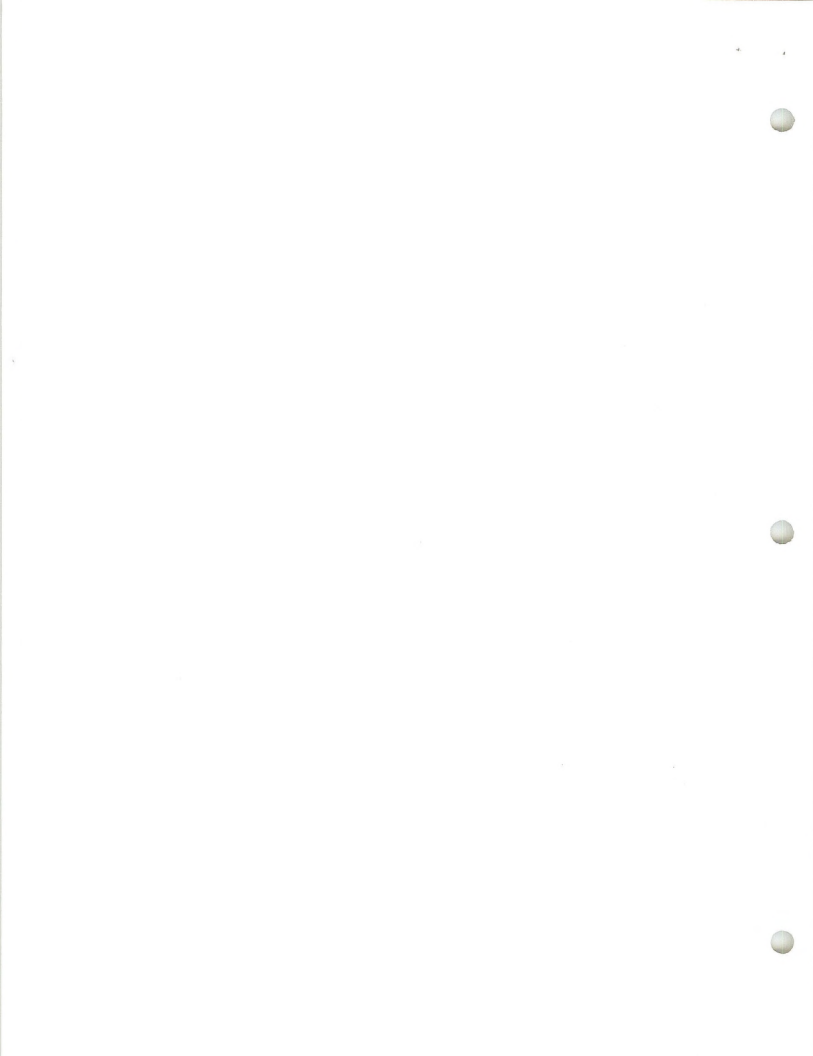
November 2, 1979

Introduction

On October 12, 1979 the City of Helena received copies of the Draft Environmental Impact Statement prepared by the State Department of Highways on the proposed expansion of the Capital Hill Shopping Center and related vacation of Sanders Street. In a cover letter from Mr. Don Gruel the City was invited to submit comments and questions which will be accepted for thirty (30) days after the date of publication. Copies of the DEIS were distributed to members of the inter-departmental staff team.

On Wednesday, October 31, 1979 the interdepartmental team assembled and discussed their individual comments on the DEIS. After considerable discussion and review, the staff came to the following major conclusion. The DEIS prepared by the Highway Department contains major inadequacies and deficiencies which in result does not sufficiently address

City of Helena, Montana



the potential direct and indirect environmental affects generated by the expansion of the Capital Hill Shopping Center and related Sanders Street closure. These major deficiencies fall generally into the following three categories:

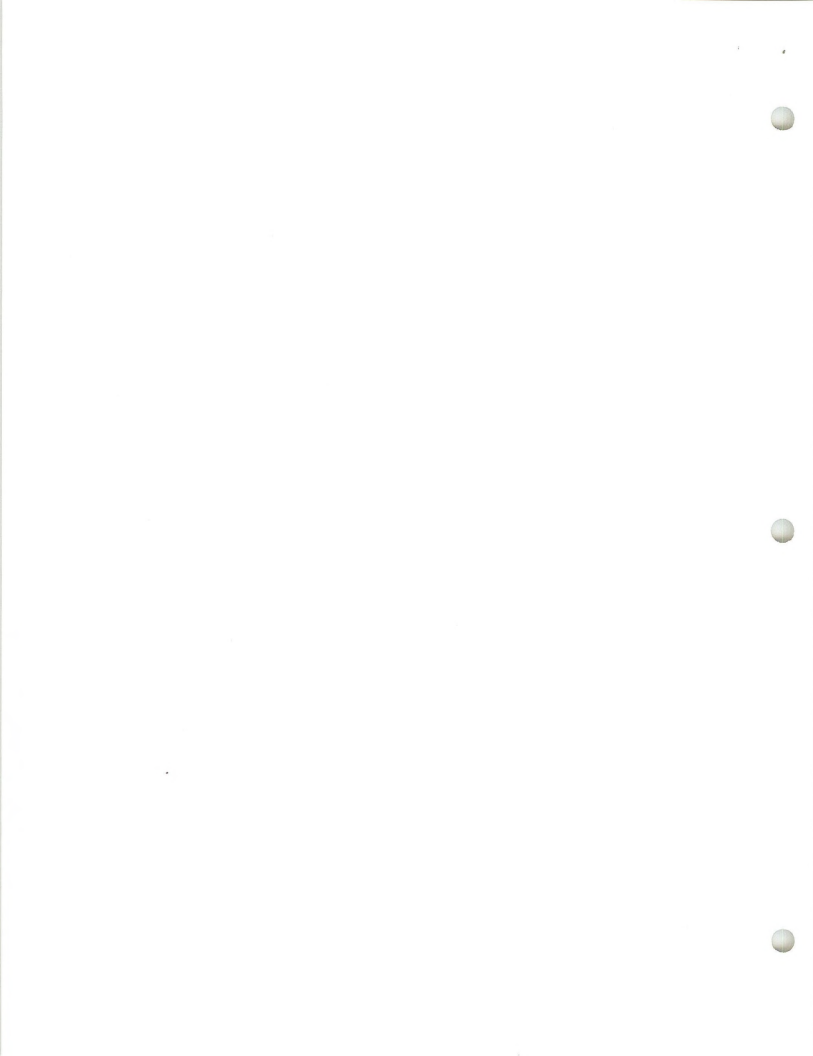
1. There is a serious lack of quantified analysis related to the examination of impact in the various subject areas. With the exception of some statements on traffic and utilities, most of the evaluation is expressed in general, non-specific comments;
2. Although there is discussion of mitigating measures, the DEIS is not organized in such a fashion to state clearly the various repercussions if mitigating measures were not provided;
3. Almost without exception the statements describing impact are couched in vague terms such as "a specific improvement may be done, or some other specific improvement could be considered". It is the opinion of staff that various improvements absolutely must be provided and should have been so stated within the DEIS in no uncertain terms.

Specific comments of the interdepartmental staff team on the DEIS are as follows:

Comments

Traffic -

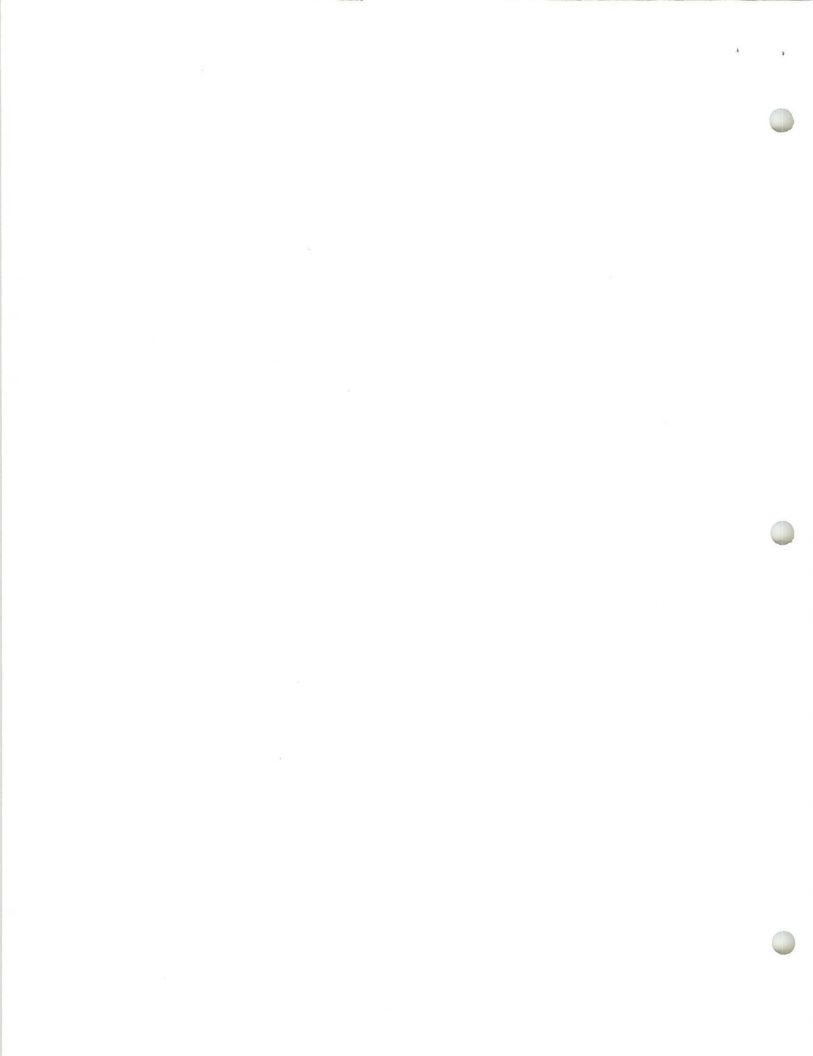
The DEIS generally described those traffic impacts outlined within the report prepared for the City last June by



Robert Peccia & Associates. Specifically, staff feels that the measures necessary to accommodate increased traffic volume and the proposed closure of Sanders Street, should have been more clearly defined in terms of their need. The DEIS merely states that such vital improvements as relocating traffic signals, widening Roberts, etc. should be considered or may or may not be provided. Additionally, the existing and future capacity of the intersection at 11th and Fce should be analyzed in terms of Capital Hill expansion. During the City's hearings and review on the Diehl Shopping Center case, it became apparent that the lack of adequate capacity at this intersection (even with proposed signal improvement) is a major impediment in efficient and safe traffic operation within this whole area of the City.

Water Supply -

The DEIS does not address the major cost (approximately \$250,000) related to the provision of new twelve inch water mains in both 11th and Prospect Avenues as discussed in the City's Water Master Plan. In general the magnitude of the water supply deficiency is not brought out. Under our present budget constraints and revenue limitations, the City could not bear the cost of construction of these new mains. There is also no discussion of the repercussions if the new water mains were not provided.



Sanitary Sewer -

The discussion of sanitary sewer is adequate.

Storm Drainage -

There is no discussion of the overall drainage area within which the shopping center lies. The City Storm Drainage Plan discussed methods of detention/retention utilizing natural drainage areas which are not discussed in the DEIS. This potential exists to the south above the shopping center immediately east of the State Capitol complex.

Gas, Electricity, and Telephones -

Costs are not addressed.

Economic and Population Impact -

The economic and demographic projections provided in pages 4 and 5 are not correlated to the proposed expansion of the shopping center.

Impact on Retail Commerce -

Estimates should be provided of the percentage addition the expansion of the shopping center would have in terms of overall retail space within the Helena market area. Potential retail displacement should be explored in more detail. There is also some overall gross retail sales data available for this area which could be presented and related to the proposed shopping center expansion.



Fiscal Impact -

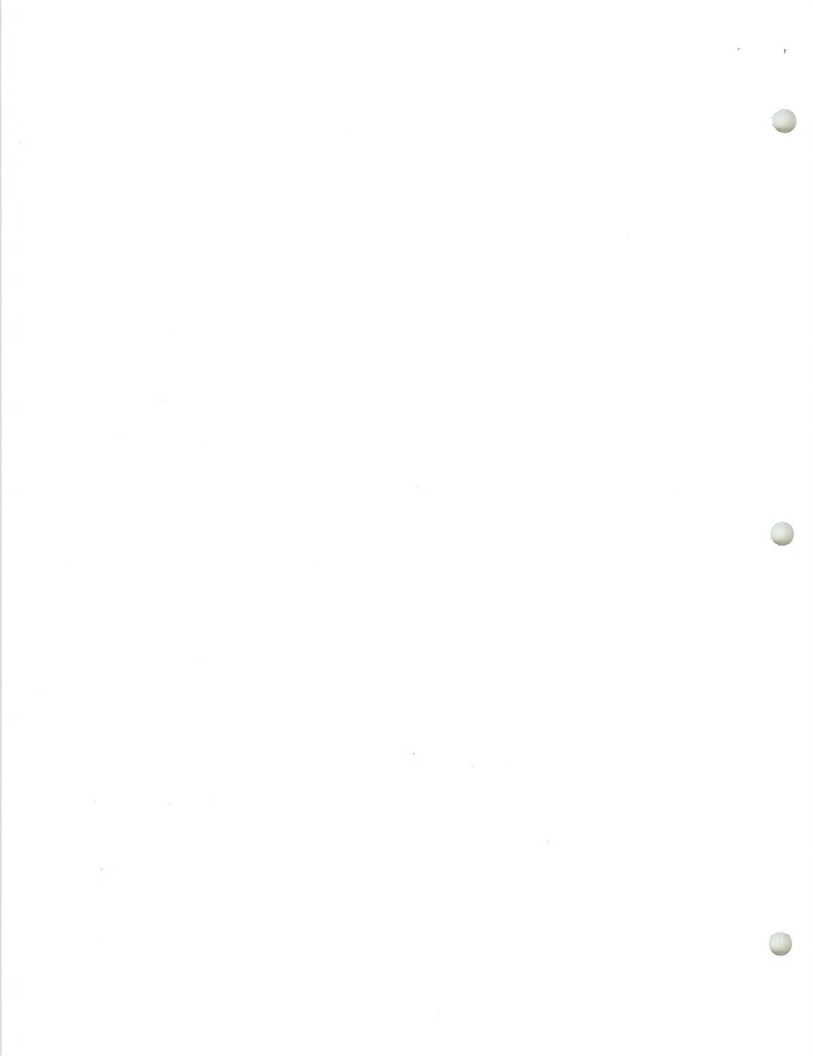
General estimated tax revenue is provided. However, there is absolutely no discussion of the corresponding costs - both direct and indirect to local government that may or may not be offset by increased tax revenue. The revenue-cost relationship should be quantified as much as possible. In addition to direct capital costs, some discussion should be provided in terms of the impact on the City's maintenance and operating costs among the various departments insofar as they would be affected by the proposed shopping center expansion.

Land Use -

A specific description of surrounding land uses should be provided, both immediately adjacent to the shopping center and within the shopping center vicinity. There is no discussion in terms of whether there would be any impact on the residential neighborhoods north and south of the 11th-Prospect one-way couplet.

Water Quality -

Other environmental impact statements prepared on commercial developments discuss the impact of auto generated pollutants settling upon the parking lot surfaces and subsequently entering the water sources through the storm drain system. In general some discussion should be provided regarding any potential non-point sources of water pollution and mitigating measures available, such as skimmers installed in parking lots.



Energy -

Energy impacts, particularly in terms of increased transportation, are not addressed.

Visual Impact -

The discussion is adequate.

Air Quality -

The discussion of air quality impact is one of the most deficient within the report. Existing air quality levels in Helena, and within the east side if available, should be discussed. Additionally, the estimated effects of increased levels of auto generated pollutants should be discussed.

Noise -

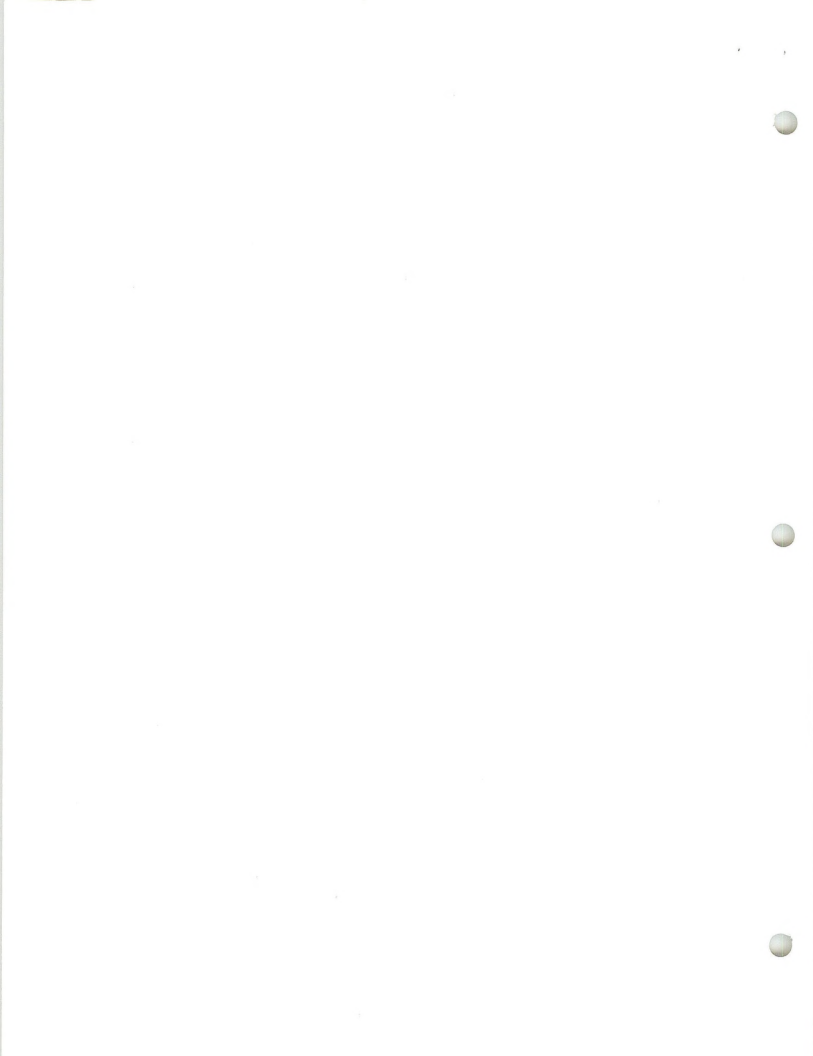
Existing noise decimal levels on the 11th-Prospect one-way couplet should be provided or estimated, along with a discussion of the affect of estimated traffic increases.

Historic And Archeological Features -

This discussion is adequate.

Police and Fire -

The affect on pblice and fire protection is not adequately discussed. On page 16 the DEIS states that the expanding of the shopping center should have no significant affects on law enforcement or fire protection. There would certainly be a major affect if new water mains were not installed on 11th and Prospect. Additionally, the estimated impact on the increased cost of police and fire protection can be estimated based upon reasonable assumptions.

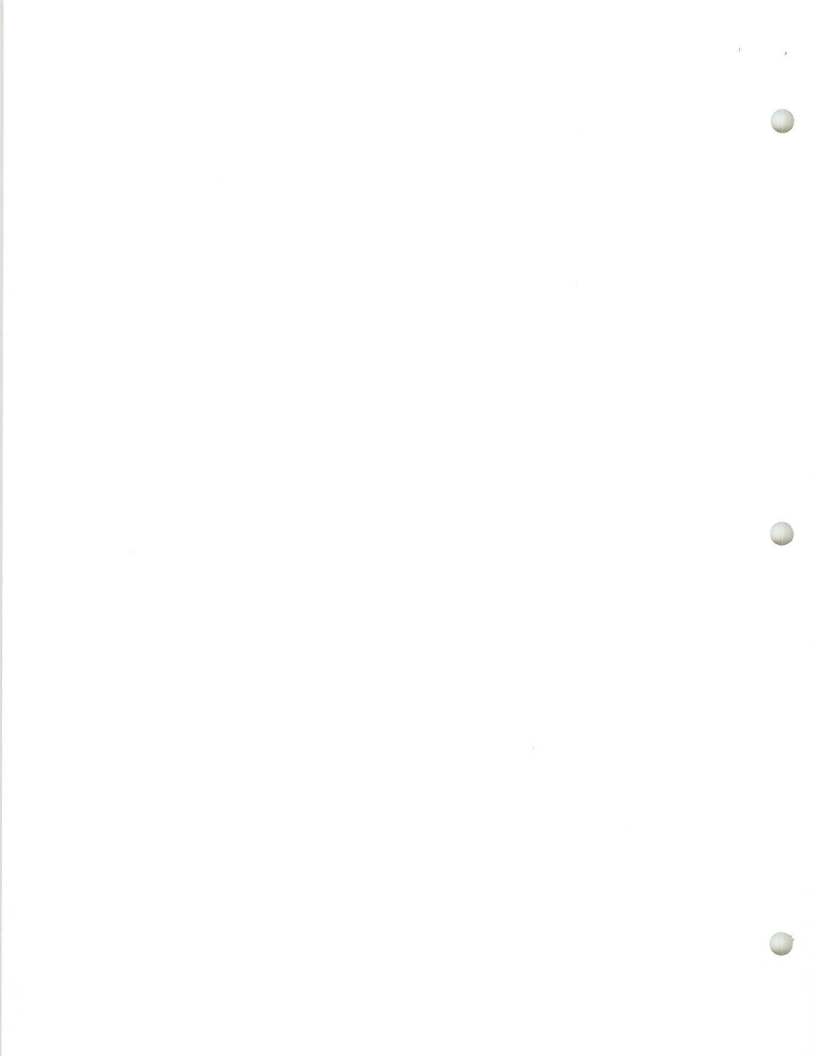


Impact on Interstate 15 and Capitol Interchange -

Impact on the adjacent Interstate and Capitol Interchange should be described. Staff feels this impact would be directly related to the capacity problem at the 11th and Fee intersection.

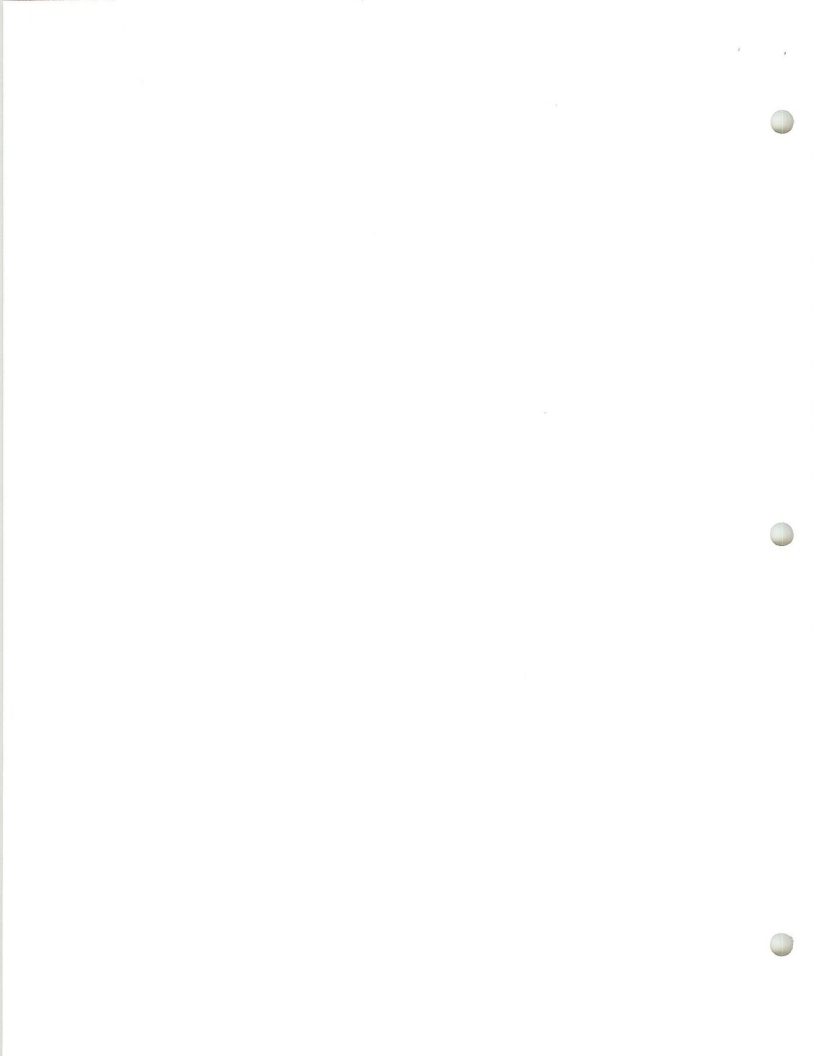
Conclusion

The interdepartmental staff team recommends to the City Commission that these comments be transmitted along with any additional comments provided by the City Commission members themselves to the State Highway Department as soon as possible. Afterwards staff recommends that a three-way meeting be held between the State Highway Department, Capital Hill Shopping Center applicants, and staff regarding ways in which these deficiencies can be met and a timetable be established for acting on the requested conditional use permit request. Some options open to the City are waiting to receive the State's final EIS or request the applicant to provide the information necessary to transmit a complete and comprehensive report to the Zoning Commission and City Commission prior to action on the request. The applicants have indicated an interest in providing the additional information along the same lines that the original Peccia report was done. This is probably the most timely method of generating the needed information and speeding the decision making process.



Appendix B

Impact Analysis Supplement by Robert Peccia & Associates



PROPOSED EXPANSION OF CAPITAL HILL SHOPPING CENTER

IMPACT ANALYSIS SUPPLEMENT

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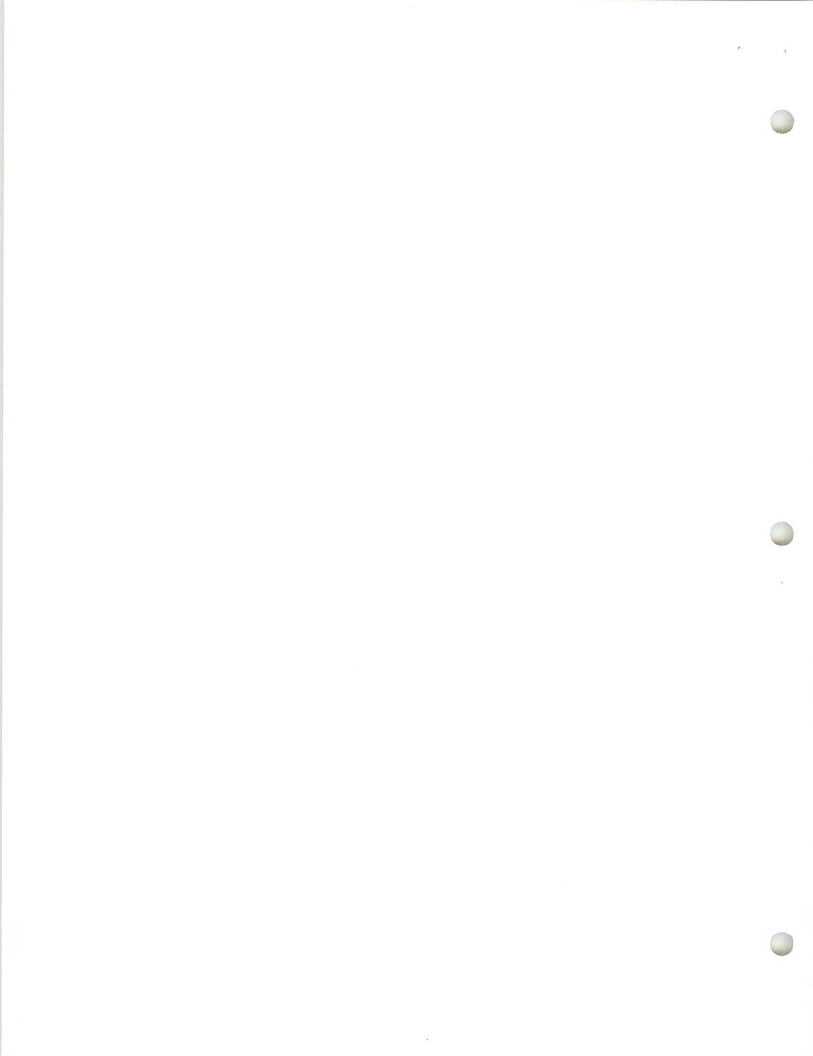
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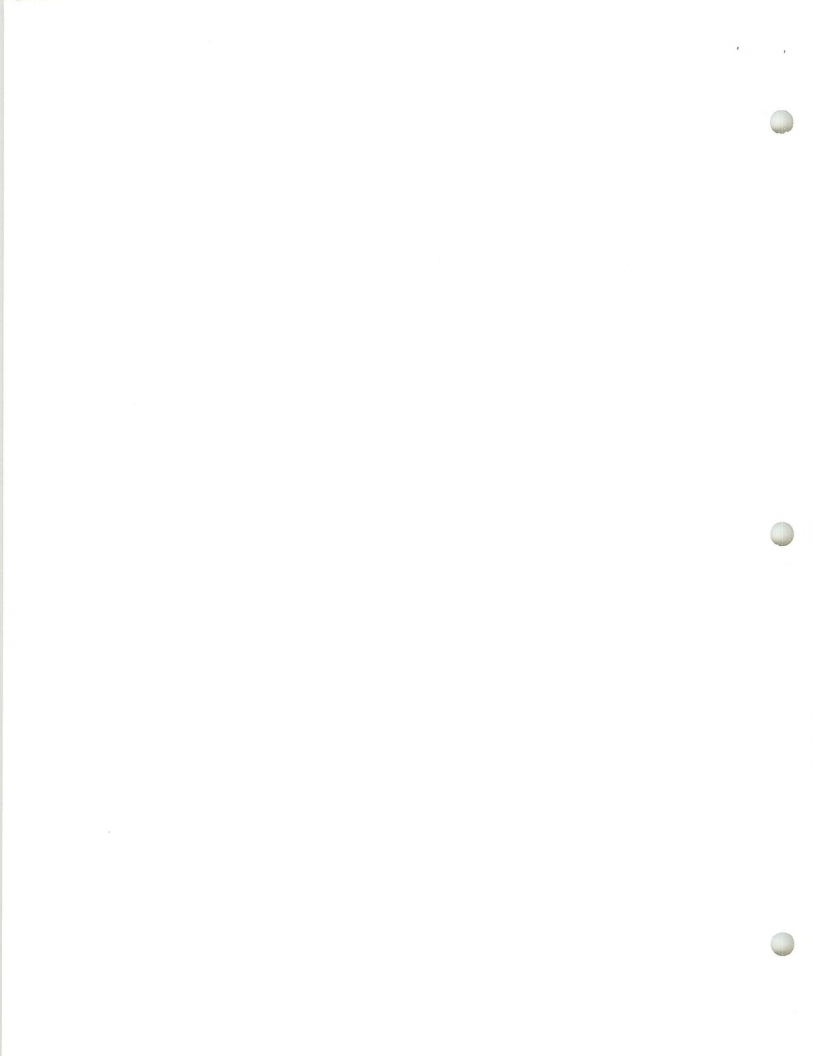
ABSTRACT

This Impact Analysis Supplement for the Proposed Expansion of the Capital Hill Shopping Center is intended to provide the City of Helena with additional data for the City's evaluation of the proposed shopping center expansion. Previous information was generated during a "Traffic and Utilities Impact Analysis" study done by Robert Peccia and Associates in June, 1979, and a Draft Environmental Statement prepared by the Department of Highways.

At the conclusion of these two studies, the City had some questions about certain areas that they felt were inadequately explored in order to make a sound decision on the proposed expansion. This report was prepared to provide additional information on specific areas that were identified and considered deficient by the City.

Because of the limited time frame in which this study was conducted, it was necessary to utilize a subjective approach to the specific investigations conducted. The development of detailed original data was impractical within the constraints allowed, and existing information and expert opinion was substituted wherever possible.

The sections in this report entitled "Economic and Demographic Impact", "Impact on Retail Trade" and "Fiscal Impact" were written by Dick Bourke of Western Analysis, Incorporated of Helena.



STORM DRAINAGE

DRAINAGE IMPROVEMENT OPPORTUNITIES

The Storm Drain Master Plan prepared by Stahly Engineering and Associates and Wright-McLaughlin Engineers for the City of Helena shows several drainage opportunities in the vicinity of the Capital Hill Shopping Center. These drainage opportunities include an open channel drainage-way and a possible hiker/biker trail along Carson Street, and the possibility of installing a detention basin of approximately four acre-feet near Sixth Avenue and Sanders Street.

Immediately south of Sixth Street and east of Sanders Street the State of Montana is constructing a parking lot that will serve as a type of detention basin. This proposed parking lot is lower than Sixth Street (which will act as a detention dam), and the lot has a storm drain inlet at the low point on the lot. It is not known what the capacity or the detention time of this inadvertent retention basin is, or if it will partially or fully meet the requirements for detention storage in the area as proposed by the Master Drainage Plan.

The State of Montana Architecture and Engineering Office also has plans for a future building site between Sixth and Ninth Streets east of Sanders. As part of the building site plan, it is anticipated that a recessed parking lot would be built that could act as a detention storage facility and meet the requirements of the Master Drainage Plan if properly designed. Phil Hauck of the State Architecture and Engineering Office indicated that the State would be willing to cooperate in implementing such a dual-use facility.

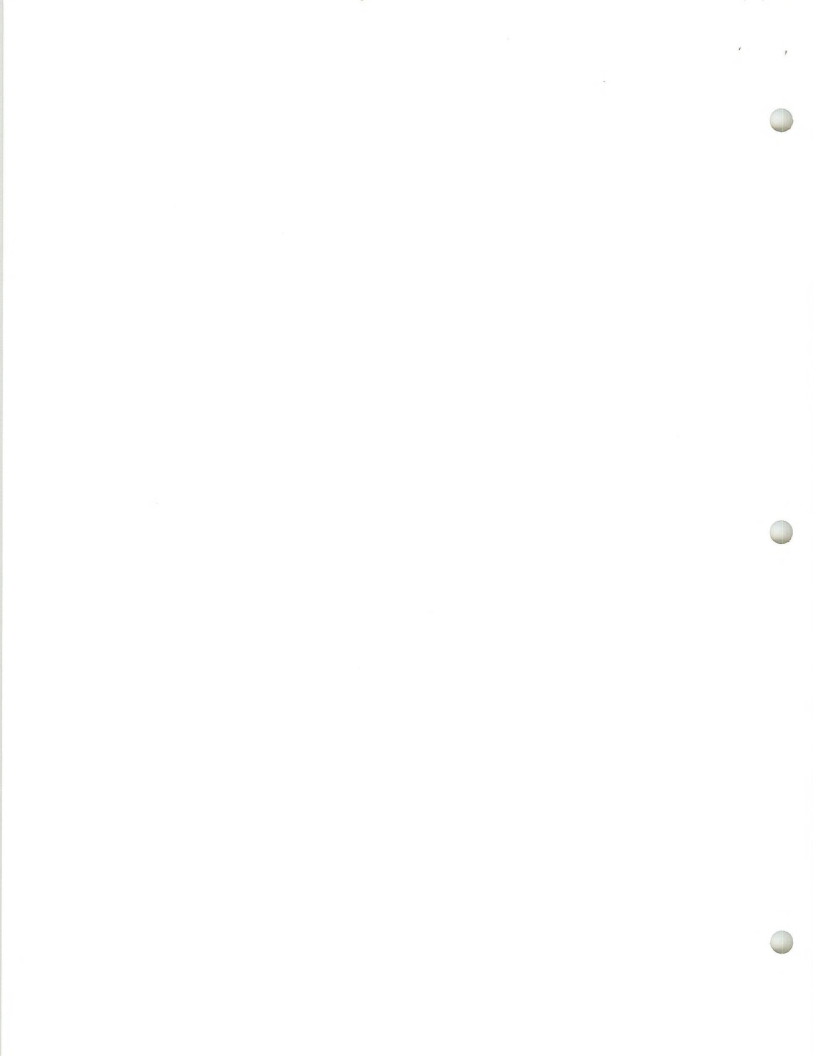
ENVIRONMENTAL CONSIDERATIONS

Current theory on storm drainage emphasizes the approach that natural drainage patterns and channels should be retained to the extent possible. This includes the use of detention and retention basins to simulate natural runoff conditions, and the preservation of natural drainage channels where possible.

The use of these concepts is beneficial in that the size of downstream storm drains and other physical facilities can be reduced. This saves on materials and construction resources that would otherwise have to be committed. In addition, residual environmental benefits include less damage downstream due to a reduction in the peak discharge, and basin recharge that would occur with percolation into the ground in the ponds and natural channels.

PROPOSED IMPROVEMENTS

The recommended storm drain scheme as contained in the Storm Drain Plan consists of an open channel along Carson Street, a detention basin at Sixth and Carson, and an underground storm drain along Sanders Street from Eighth Street to Missoula, then along Harris Street from



Missoula to the retention basins north of K-Mart. A storm drain branch joins the main storm drain trunk at Sanders and Butte, and a detention basin is also planned near the intersection of Harris and Missoula.

This storm drain scheme is planned to act as a "system". If various components of the system are not installed or operated as planned, the system will not function as planned. A good example is that if the detention basins were not in operation during a design flood, then the peaking period would be reduced, the peak flood discharge would be greater, and the size of the storm drains would have to be increased.

Since the components of the recommended drainage plan have not been finalized, and because construction activities now occurring near Sixth and Carson may require changes in the Recommended Plan, a specific storm drain system cannot be established and analyzed within the scope of this Impact Analysis. For the purposes of this study, it has been assumed that the storm drain system upstream of the intersection of Sanders and Butte on the Sanders Street Branch would be constructed in such a manner so as to give the same effect as the Recommended Plan. At this intersection, provisions would be made to continue the storm runoff through a connection to the existing box culvert and/or surface flow. This subsystem could be designed to act in accordance with existing drainage patterns of an interim basis, and would be compatible with the remainder of the storm drain system when it is constructed.

SUMMARY

Because the components of the storm drain system interact to form a system of handling storm runoff, it is necessary to look at storm drainage from a systems approach. It is advisable from the standpoint of assuring the proper operation of the storm drain system to design and construct specific components of the system so that the operation of the components is consistent with the overall storm drain plan. For the area that would be impacted by the shopping center, the storm drainage subsystem consisting of a storm drain along Sanders from Butte to Eighth, a detention basin near Sixth and Carson, and a natural channel along Carson would be a logical choice for a subsystem improvement that could be coordinated with other recommended improvements at a later date. Modifications in design to achieve the effect of this subsystem would likely have to occur due to existing construction activities in the area of the detention pond.



ECONOMIC AND DEMOGRAPHIC IMPACT

Two types of jobs will be created by the expansion of Capital Hill Mall, those due to construction and those attributable to the expanded retail trade.

The completed mall expansion is expected to cost \$8.7 million.² This is roughly 60 percent of the projected cost of constructing Frontier Mall. When accounting for the square footage involved in each project, it appears that either Capital Hill may have overestimated their costs or Frontier Mall underestimated theirs, assuming that the quality of construction is similar. Applying a 60 percent ratio to the projected construction jobs associated with Frontier Mall results in a projection of roughly 12 full-time jobs during the entire construction phase (18 months), and as many as 30 during the peak construction months.

Sales jobs may be estimated using two methodologies. The first is by applying historical ratios of retail sales/retail employment to projected sales in the expanded area of the mall. In 1972 there were \$40,795 of retail sales in Lewis and Clark County per each employee. By 1977 this figure had increased to \$53,505, or 5.9 percent per year between 1972 and 1977. Applying this factor to the years 1978 and 1979 results in a projected ratio of about \$60,000 per employee in 1979.

Dividing the range of projected sales (\$8.1 - \$13.2 million) by \$60,000 results in a projected increase of 135 to 220 jobs. If one assumes that 25 percent of these jobs were relocated, then the net increase in jobs is between 100 and 165.

The second approach is to estimate new jobs on the basis of square footage. According to existing similar malls, there is about 615-745 square feet of leasable area per each employee. The upper bound of the range would represent the case where a large percentage (50 to 75 percent) of the mall were occupied by a "major" retailer, since the number of employees per square foot in this case is substantially less than when small retailers occupy a greater share of the leasable area.

Using this range and applying it to a 110,000 square foot expansion results in 148 to 179 projected new jobs. Because 80 percent of the expansion will be occupied by a "major" retailer and the Capital Hill Draft E.I.S. projected 120 to 145 jobs,⁴ we will project 130 to 150 new jobs. With a 25 percent relocation factor this reduces to about 100 to 110 new jobs. It is anticipated that only about 80 percent of these jobs will be full-time, the rest will be part-time.

There will be little or no secondary impact from this job increase. This is due to the fact that these are service sector jobs, relatively low paying and usually filled by second wage earners in the family. The population impact will be minimal because most of the jobs will be filled by existing residents.

Based on an average 1977 salary of \$7,416 for county employees in the retail sector of the economy, projected increases in employment will result in an increase of between .2 and .5 percent in Lewis and Clark County personal income.

NOTE: The footnotes for this chapter are contained at the end of Chapter IV - "Fiscal Analysis".

IMPACT ON RETAIL TRADE

Determining the impact of the mall expansion on retail trade requires the following calculations:

- Estimate percent of market share captured by the mall expansion through use of the ratio of its square footage to the total expected retail square footage in the trading area.
- Estimate current and potential retail sales in the trading area, including the effects of sales leakage.
- Calculate range of expected sales through applying the anticipated percent of market share to the potential market sales, and through conversations with the developers.

There are roughly 950,000 square feet of space in the City of Helena and about 100,000 square feet of space in the trading area but outside the city limits. This is defined as space currently occupied by tenants appropriate to the mall expansion.¹

Adding the 110,000 square feet of expansion space to the total existing space of 1,050,000 square feet gives us 1,160,000 square feet of expected space after the expansion, assuming that no space is vacated by existing retailers who may relocate to the new space.

An alternative approach considering the effects of relocation requires an assumption about how much space would be rented by tenants who have relocated. The Diehl market study assumed 25 percent.¹ A conversation with Doug Buchi, Manager of Capital Hill, revealed that he expects little, if any, relocation. However, he also made it clear that if they were approached by retailers who wished to relocate and were compatible with the shopping center, the developers would be interested.²

Assuming a 25 percent relocation factor gives us a net increase in occupied space of 110,000 to 110,000 (.25) or 82,000 square feet. This added to 1,050,000 square feet equals 1,132,000 square feet of retail space after the expansion.

Deriving percent of market share supply follows:

CASE A: No Relocation

$$\frac{110,000}{1,160,000} = 9.5 \text{ percent}$$

CASE B: 25 Percent Relocation

$$\frac{110,000}{1,132,000} = 9.7 \text{ percent}$$

We will assume a captive rate of 9.6 percent of trading area retail sales for the purposes of the



remainder of the analysis. Using this figure assumes that no other major new regional shopping malls are constructed. The captive rate would be reduced if other new malls were relatively more competitive. Also, the expected captive rate of 9.6 percent would be low if the expanded Capital Hill Mall enjoyed distinct competitive advantages over the other retail space in the area.

The first step in estimating trading area sales potential is to determine the trading area. We feel that the primary trading area includes most of Lewis and Clark County, Powell County east of Avon and the northern portions of Broadwater and Jefferson Counties. According to the 1977 Census of Retail Trade, retail sales in the trading area are broken down as follows:³

TABLE 1

RETAIL SALES IN TRADING AREA (1977)
(Thousands of Dollars)

City of Helena	164,135
Lewis and Clark County ^a	8,099
Jefferson County ^b	4,558
Broadwater County ^b	8,705
	185,497

^a This is the remainder of the county. Including all of the rest of the county will adjust for not including the area west of the county line to Avon.

^b These figures represent three-fourths of the total retail sales for these counties.

We assumed an increase in retail sales of eight percent in 1978 and ten percent in 1979, principally due to the effects of inflation. Adjusting the 1977 figure for these years results in 1979 expected retail sales of \$220,374,000.

This figure is for total retail sales. Not all retailers will be appropriate to the expanded Capital Hill Shopping Center. It is important to adjust for the fact that potential tenants do not include all the categories of retailers included in the above figures. Categories of stores considered inappropriate to the expanded Capital Hill Mall include:

- Food Stores
- Automotive Dealers
- Gasoline Service Stations
- Liquor and Used Merchandise Stores
- Lumber and Building Materials

Retail Nurseries
 Mobile Home Dealers
 Nonstore Retailers
 Fuel and Ice Dealers

These categories represent 63.5 percent of total statewide retail sales in 1977.³ Adjusting the above total trading area sales figure of \$220.4 million for this factor results in \$80.4 million of trading area retail sales appropriate to the mall expansion.

Before arriving at an estimate of retail sales attributable to the mall expansion we must consider the effects of sales leakage. Sales leakage will allow us to adjust the \$80.4 million figure for potential sales which are not now being captured by the trading area. Sales leakage is that share of potential sales made outside the trading area.

Potential retail sales have been defined as 65 percent of personal income.¹ Time constraints did not allow us the opportunity to analyze the reasonableness of the figure, so we will assume that it is correct. In 1977 personal income in Lewis and Clark County amounted to \$285.3 million. Multiplying this by .65 gives us a potential retail sales figure of \$185.4 million. Comparing actual sales of \$172.2 million to this figure results in an estimated sales leakage of \$13.2 million, or 7.1 percent.

Analyses done for the proposed Diehl shopping center concluded, based upon a thorough license plate survey, that:¹

An analysis of the foregoing competition section suggests that the significant comparison shopping competition outside Helena is minimal, both presently and upon completion of all proposed new projects, expansions and/or recycling outside the trading area . . .

More specifically, actual sales leakage could appear to be very nominal or, possibly, there exists a greater volume of expenditures from outside the trading area than leaks from the trading area to other areas.

For the purposes of this analysis, therefore, we will assume a sales leakage figure of five percent. Adding this to \$80.4 million gives us potential retail sales appropriate to the mall of \$84.6 million. Assuming a 9.6 percent captive rate results in \$8.12 million in retail sales expected for the 110,000 square foot mall expansion, or about \$74/square foot. This is significantly less than the current sales figure for Capital Hill of \$143/square foot, but Doug Buchi acknowledged to us that they expected their average sales per square foot to decrease, since a greater share of their total space after expansion would be occupied by a "major" tenant.²

Using \$120/square foot, therefore, as an upper level, it is reasonable to project first year sales in the expanded portion of the mall at between \$8.1 million and \$13.2 million.

NOTE: The footnotes for this chapter are contained at the end of Chapter IV - "Fiscal Analysis".



FISCAL IMPACT

A. REVENUES

Potential revenues associated with the Capital Hill expansion are principally dependent upon assumptions regarding assessed value of the property. The Montana Department of Revenue has estimated that new commercial construction is normally assessed at roughly one-half of its construction cost.⁵ Assuming the construction costs to be \$8.7 million, the assessed value will be \$4.35 million. The taxable value is derived by simply applying the statutory ratio of .0855 to \$4.35 million, resulting in a taxable value of about \$370,000.

Table 2 shows projections of local revenues derived by multiplying the taxable value by 1979 mill levies.

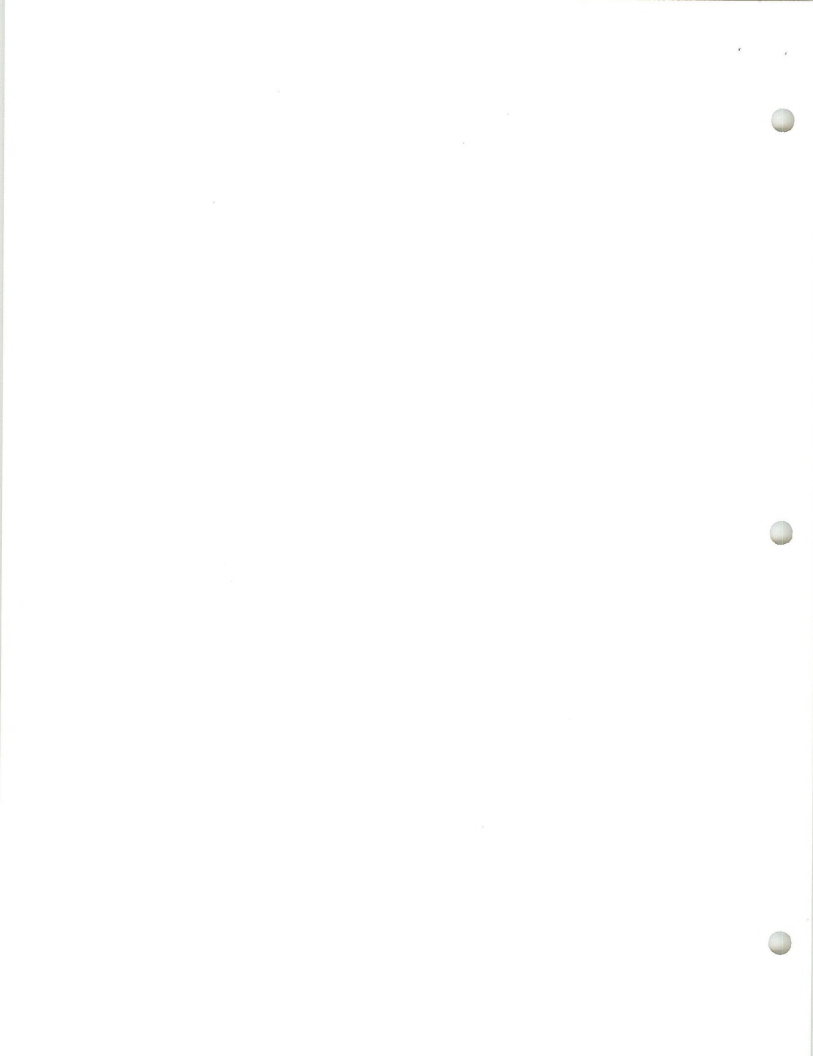
TABLE 2
PROJECTED REVENUES DUE TO MALL EXPANSION

<u>JURISDICTION</u>	<u>LEVY</u>	<u>REVENUES</u>
City of Helena	(.06632)	\$24,500
Lewis and Clark County	(.05389)	\$19,900
School District Number One	(.18104)	\$67,000
State Seven Mill Levy	(.007)	\$2,600
TOTAL —		\$114,000

To arrive at the net, or marginal, increase in revenues one should subtract from the above figures the taxes currently paid on the property to be acquired for mall expansion. The property today has a taxable value of \$7,812.⁶ It is assumed that most of this is attributable to the land, since the building on the property is small and at least fifteen years old. Since the value of the land will be unchanged after expansion, we can disregard the current revenues associated with the building since they are minimal.

B. COSTS

We have used both quantitative and qualitative methods to estimate public costs due to the mall expansion. The quantitative approach used to estimate operating and maintenance expenses is the Proportional Valuation Method, which usually employs a two-step process to assign a share



of public costs to a new commercial or industrial facility. First, a share of total municipal costs is attributed to all nonresidential uses. Second, a portion of these recommended costs is allocated to the incoming commercial/industrial facility. A basic assumption of this approach is that municipal costs increase with the intensity of land use, and change in real property value is a reasonable substitute for change in intensity of use.⁹

We have also relied heavily on interviews with local officials to estimate future operation and maintenance costs which may be associated with the capital improvements recommended and shown in Table 3.⁹

The Proposed Valuation Method is used below to project increases in city costs. We will only estimate costs to the city because operation and maintenance costs to the county will obviously be minimal. Our approach will be less technically accurate than the normal method since the available county tax data does not allow for an easy determination of number of parcels and taxable valuation due to nonresidential, as opposed to residential, properties. While the information is available in the files, it has not been coded for entry into the computer system.^{5, 6, 8} Time constraints precluded manually sorting through the tax files to obtain this information.

Since commercial and residential property cannot be singled out, we will simply assign a share of the total city operation and maintenance costs to the mall expansion, based on the ratio of increased taxable valuation due to the expansion of total city taxable valuation. By skipping the steps which assign a share of municipal costs to nonresidential property, we will be projecting a much "softer" number than we would have if we could have identified taxable valuation due to nonresidential property. This would have allowed us to use a refinement coefficient adjusting for the difference between average nonresidential property values and total property values.

Total city taxable valuation is \$30,627,000. Assuming a taxable valuation for the mall expansion of \$370,000 results in a ratio of the former to the latter of .012. Applying this to the city operating budget of \$6,541,554 (exclusive of capital outlays) gives us projected annual operation and maintenance costs of about \$78,500.

Now, we must apply to this number a second refinement coefficient which is used to adjust for differences between the taxable value of the development under consideration and average taxable values of existing nonresidential property. Since this is one of the largest commercial projects in the city and it is newly constructed, we feel that it is fair to assume that its projected taxable value of \$370,000 is 10 to 20 times the average per-parcel taxable value of nonresidential property.

Applying the relevant coefficients to the above figure of \$78,500 reveals the projected operation and maintenance costs shown in Table 4.



TABLE 3

ESTIMATED COSTS OF RECOMMENDED IMPROVEMENTS

<u>IMPROVEMENT</u>	<u>COST</u>
1. <u>Traffic Signals</u>	\$110,000.00
Remove the signal at Sanders and Prospect and relocate it to Roberts and Prospect, and install a new signal at Roberts and Eleventh.	
2. <u>Widen Roberts Street</u>	\$45,000.00
New pavement and curb and gutter for a 48' street from Ninth to Prospect.	
3. <u>Water Supply and Fire Protection</u>	\$250,000.00
New 12-inch mains in Prospect and Eleventh from Fee to Roberts and a new 10-inch main in Roberts Street. Also includes five new fire hydrants.	
4. <u>Sanitary Sewer</u>	\$40,000.00
Abandon existing sanitary sewer in Sanders Street and relocate it to flow through the parking lot.	
5. <u>Storm Drain System</u>	\$95,000.00
Construct a grass-lined channel along Carson Street, a detention basin at Carson and Sixth, and an underground storm drain in Sanders from Eighth to Butte.	
6. <u>Gas and Electricity</u>	\$20,000.00
Relocate gas and electric lines as required by the Montana Power Company.	
7. <u>Telephone</u>	\$10,000.00
Relocate telephone lines as required by the Mountain Bell Telephone Company.	
TOTAL IMPROVEMENTS —	\$570,000.00



TABLE 4

PROJECTED OPERATION AND MAINTENANCE COSTS DUE TO
CAPITAL HILL MALL EXPANSION

GROSS O. & M. COSTS	RATIO ^a	REFINEMENT COEFFICIENT ^b	NET O. & M. COSTS
\$78,500.00	10 x 1	.30	\$23,350
78,500.00	15 x 1	.28	21,980
78,500.00	20 x 1	.25	19,625

^a Average per-parcel taxable value of nonresidential property.

^b Derived from Burchell and Listokin.⁹

Depending, of course, upon one's assumption about the ratio, it would appear that the Proportional Valuation Method results in roughly similar projected revenues and costs.

Conversations with city personnel reveal that this estimate of costs is at least reasonable, and perhaps too high. Apparently, the conventional method for financing the capital improvements listed in Table 3 is through a Special Improvements District, with financing costs borne directly by the developer.

Expected operation and maintenance costs associated with the improvements can be summarized as follows:

Traffic Signals - borne by the State of Montana because located on state highway.

Roberts Street - may actually decrease since new pavement costs less to maintain; costs because of increased traffic on other streets not calculated.

Water and Fire - minimal except for periodic checking of fire hydrants. Since new fire station is three blocks away, no recognizable burden on fire department.

Sanitary Sewer - minimal except for occasional cleaning of lines.

Storm Drain - minimal unless cleaning required when plugged.

Police - will cause increased burden on police due to potential for misdemeanors.



A summary of projected costs and revenues to local taxing jurisdictions follows:

- (1) It appears that the City of Helena will receive no significant budgetary impact, either positively or negatively; the major variables that will affect this are how the assessed value of the property after expansion compares with our assumed valuation of \$4.35 million, and the ratio of taxable value of the property to average figures for nonresidential parcels.
- (2) The county should receive a net inflow of funds, since it incurs no appreciable operation and maintenance costs due to the mall expansion.
- (3) School District Number One will receive a net positive cash inflow, assuming the project results in no increase in school-age students in the District.
- (4) Applying the State Seven Mill Levy will result in a small amount of funds going to higher education.



FOOTNOTES

- 1 Shopping Center Services, Inc., *Market Analysis for Proposed Regional Shopping Mall*, for the Diehl Company, Centerville, Utah, January, 1978.
- 2 Conversation with Doug Buchi, Clark Financial Services, Salt Lake City, Utah, November 16, 1979.
- 3 *Census of Retail Trade, 1977*, U.S. Bureau of The Census, Department of Commerce, Washington, D.C., August, 1979.
- 4 Montana Department of Highways, *Capital Hill Shopping Center, Draft Environmental Statement*, Helena, Montana, October 11, 1979.
- 5 Conversation with Dennis Burr, Department of Revenue, Helena, Montana, November 16, 1979.
- 6 Conversation with Roy Kimble, Lewis and Clark County, Helena, Montana, November 16, 1979.
- 7 Robert Peccia and Associates, Helena, Montana, June 14, 1979.
- 8 Conversation with Don Stratton, Lewis and Clark County, Helena, Montana, November 16, 1979.
- 9 Burchell, Robert W. and David Listokin, *The Fiscal Impact Handbook*, Center for Urban Policy Research, New Brunswick, New Jersey, 1978.



LAND USE

EXISTING LAND USE

Land use data for the area surrounding the Capital Hill Shopping Center was obtained from information provided by the Areawide Planning Organization. The agency conducted a land use inventory of the area and prepared a land use display map approximately one year ago. This land use map was checked by means of a field inventory and found to be consistent with current land uses in the area.

Figure 1 illustrates the existing land use pattern within the vicinity of Capital Hill Shopping Center from Montana Avenue to Interstate 15. The existing land use information is classified into six categories: single-family dwellings, multi-family dwellings, commercial, public and institutional, parkland, and vacant land. As indicated by the figure, the area is characterized by a commercial strip along Eleventh and Prospect (extending one-half block north of Prospect and one-half block south of Eleventh.) The density of this commercial core has increased in recent years due to the fact that numerous convenience stores, restaurants and motels have located along Prospect and Eleventh Avenues and in close proximity to Interstate 15. The primary land use in much of the area adjacent to this commercial strip is residential. The residential land use in this area consists of primarily single-family dwellings and older and recently constructed multi-family dwellings which are becoming more common in areas where multi-family housing is permitted. A large portion of the area adjacent to Capital Hill Shopping Center is also utilized for public and institutional purposes, as numerous state offices and departments are located in the area.

ZONING

The shopping center is in a B-2 (Community - Highway Business District) zone. Adjacent zones consist predominantly of R-2 (Single-family Residential) with some R-3 (Multi-family Residential), R-O (Residential-Office) and PU (Public Lands and Institutions) in the area around the shopping center. Figure 2 shows the current zoning for this part of the city.

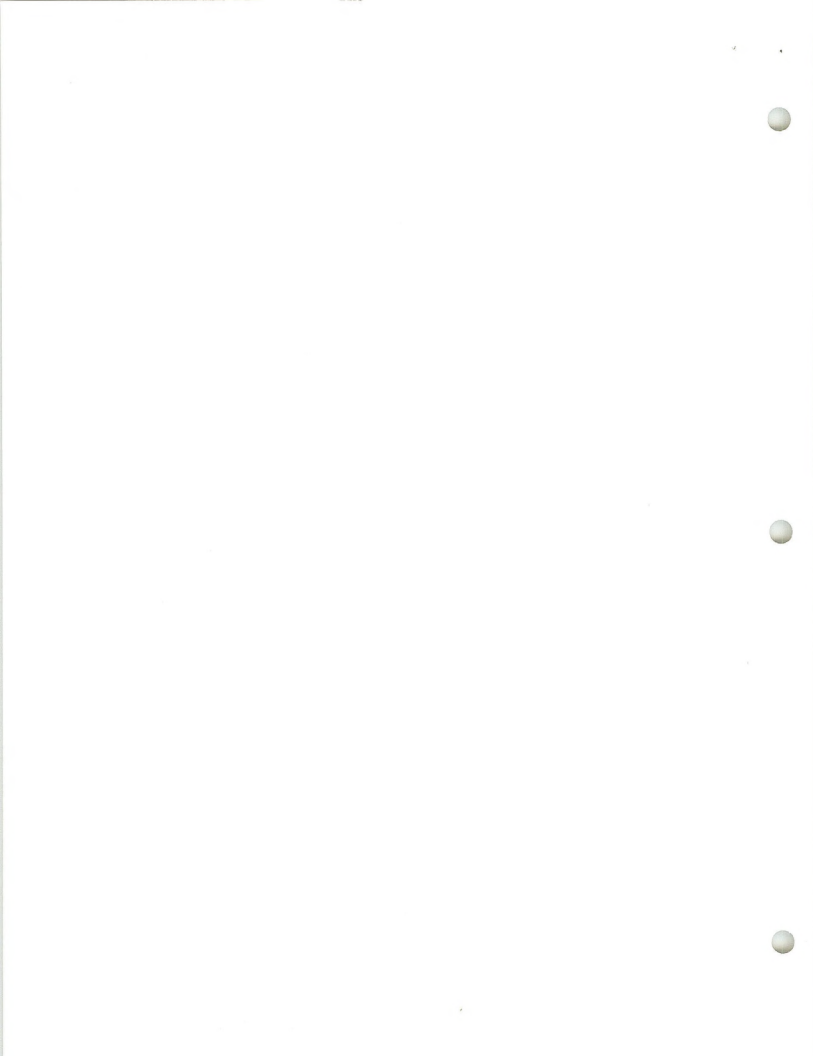
It is noted that the land uses conform relatively closely to the zoning. There has been some extension of the commercial strip to a full block to the north of Prospect Avenue, but in general there is not an excessive amount of non-conforming uses in the area.

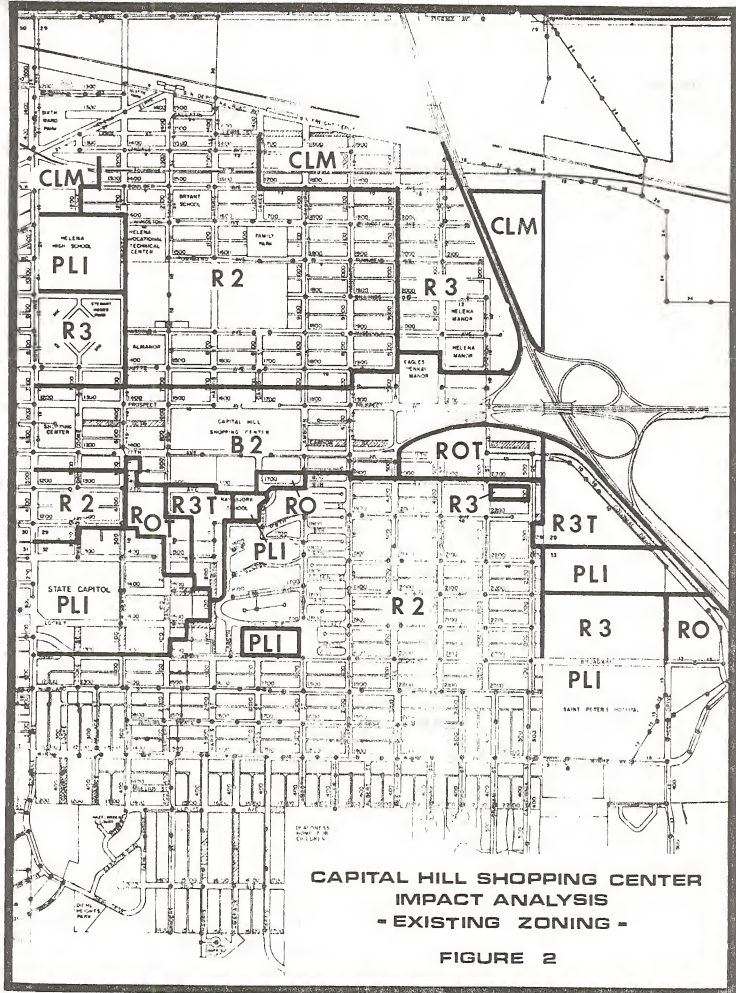
IMPACT ON EXISTING LAND USE

The increased retail trade of the shopping center will increase the traffic to the area and the peripheral land will become more desirable to use in a commercial manner. It is expected that there would be an increased demand to extend the commercial strip from one-half block to a full block on both sides of Eleventh and Prospect Avenues due to the additional activity generated by the shopping center expansion.



There would also be a moderate increase in traffic on Ninth Avenue from rerouting of traffic due to the closure of Sanders Street. Other increases in neighborhood traffic volumes should be slight as long as the Eleventh and Prospect one-way couplet is functioning smoothly.







WATER QUALITY

WATER QUALITY BUREAU COMMENTS

To aid in the assessment of the shopping center expansion on water quality, the Water Quality Bureau of the Montana Department of Health and Environmental Sciences was asked to comment on potential impact on water quality. The Water Quality Bureau was very cooperative and responded with the letter reproduced on the following page. An office memorandum previously prepared by the Water Quality Bureau is also included in this section.

SUMMARY

As noted in the Water Quality Bureau letter, the probable increase in vehicular traffic would lead to increased pollutants in the runoff. In addition, newly paved areas would have a higher oil content at the pavement surface, some of which would be picked up by runoff. These effects would be considered minor and not out of context with the existing uses and similar development occurring in the area. Some benefit to water quality may result due to proposed improvements in the storm drain system, particularly in the amount of sediment that would be contained in the runoff.

Mitigating measures that could be considered include oil skimmers. However, the Water Quality Bureau indicated that skimmers have operation problems and if not properly maintained do not work very well. In addition, the retention and detention basins as proposed in the Storm Drain Master Plan will aid in cleansing the runoff since the runoff will be detained for a period of time prior to being discharged to a water course.



November 28, 1979

Mr. Robert J. Peccia
Robert Peccia & Associates
One North Last Chance Gulch - Suite 3
Helena, MT 59601

RE: Capital Hill Shopping Center
Helena

Dear Bob:

In response to your request for an opinion on the effects of the Capital Hill Shopping Center on water quality, I have the following comments:

1) The comments I provided to Tom Ellerhoff in September (copy enclosed) regarding the water supply on the commercial strip still hold. The comments were largely on quantity of water available, not quality.

2) The recent report "Urban Stormwater Quality Evaluation and Pollution Abatement Guidelines" submitted to the Department by Wright-McLaughlin Engineers includes a proposed plan for pollutant reduction in runoff for Helena. Both this plan and the present Helena master drainage plan include retention and/or detention basins for the Davis Gulch runoff. The runoff from the shopping center should be routed to these basins for treatment. The engineering plans for the stormwater improvements as well as any water and sewer improvements must be submitted to the Department for review prior to construction. You should of course also work closely with the City on all improvements and changes. The developer or owner of the shopping center should arrange for regular sweeping of the parking areas. The probable increase in vehicular traffic would lead to increase amounts of oils and grease, sediment, phenols, metals etc. in the runoff.

3) I have no comments on the sanitary sewer other than those mentioned above regarding submission of plans.

Sincerely,



James Melstad
Water Quality Bureau
Environmental Sciences Division

JM:jrh



Office Memorandum

STATE DEPARTMENT OF HEALTH
AND ENVIRONMENTAL SCIENCES

TO : Tom Ellerhoff
FROM : Jim Melstad
SUBJECT: Capitol Hill Shopping Center Expansion

DATE: 9/12/79

1. Water - The Morrison-Maierle-Montgomery report titled "Water System Improvement Program and Master Plan for the City of Helena" (April, 1978) points out fire protection deficiencies in the commercial areas of Eleventh and Prospect Avenues. The report states: "... fire protection is severely lacking in several areas of the City, most notably the commercial areas along Eleventh and Prospect and North Montana Avenues." The report recommends installation of larger mains on Eleventh and Prospect Avenues.

The primary concern of the Department of Health and Environmental Sciences is that water of adequate quality and quantity is provided for human consumption. There are no apparent problems along the commercial strip in providing water for human consumption at this time. Pressure reduction in the distribution system during a period of high fire demand could cause contamination to be drawn into the system through faulty plumbing in structures within the affected area. This could jeopardize the drinking water supply.

It is recommended, however, that the City of Helena continue work toward providing adequate fire protection for the commercial strip whether the shopping center expansion occurs or not. The necessary improvements for commercial fire protection should be borne wholly by the commercial establishments which benefit from the improvements and not to be charged to residential users.

2. Sewer - No comment.
3. Storm Drainage - The developer(s) and the City of Helena should work closely together in this regard. Any changes in the storm drainage plan (soon to be completed by Stahly Engineering and Associates and Wright-McLaughlin Engineers) caused by the shopping center expansion should be carefully considered.
4. Engineering plans and specifications for water, sewer and storm drainage improvements and alterations must be submitted to the Department for review.



ENERGY

MAJOR CONSIDERATIONS

Energy consumption for the shopping center is primarily related to the use of energy for the activities of the shopping center (heating, air conditioning, utilities, etc.) and transportation needs to travel to and from the shopping center. Other energy considerations include committed materials and construction for the existing facility and energy needs for the proposed expansion. Current energy supply conditions and the potential for further limitations on both natural gas and gasoline may pose constraints for any development. Due to the major impact of a shopping center, an assessment of energy impacts is particularly important, and decisions on shopping centers will have significant effects on the energy use within a community.

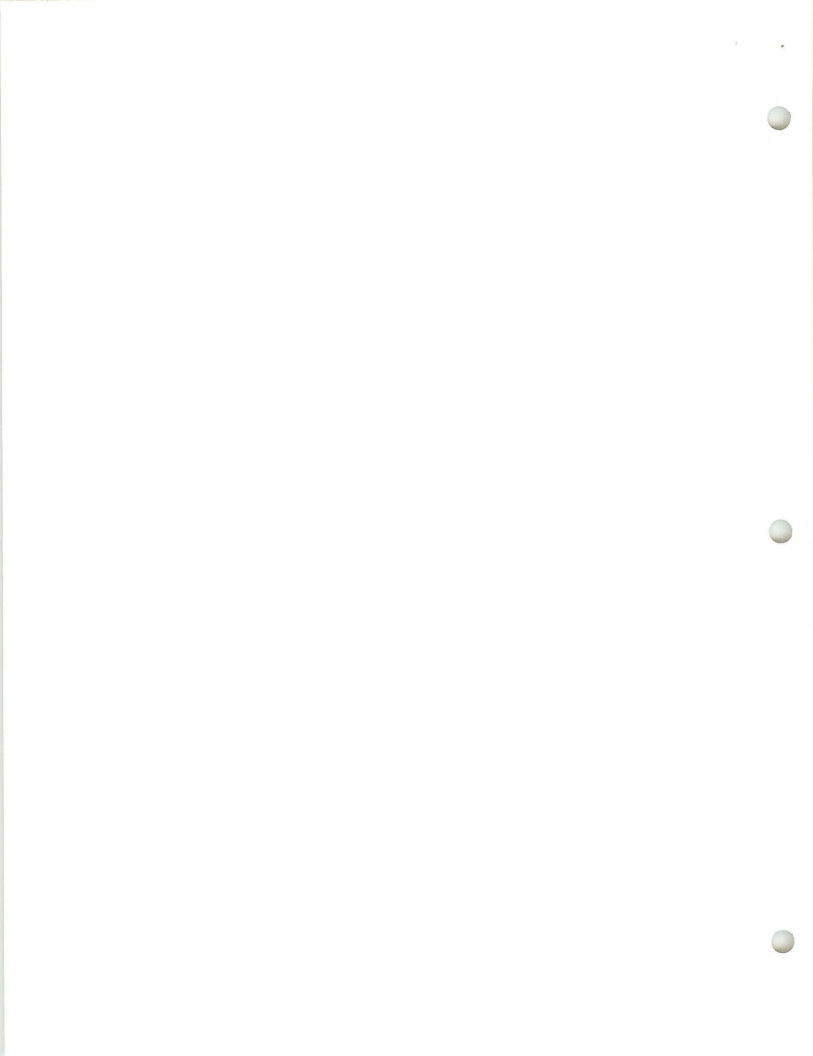
It is important to recognize that shopping centers do provide needed functions and services. If these functions and services are provided more efficiently by a shopping center of a specified size and nature, it is possible that energy savings may result. This discussion is based on an assessment of these considerations and although subjective, attempts to draw conclusions from a logical sequence of analysis.

ENERGY USE IN BUILDINGS

The existing Capital Hill Shopping Center is a single-story structure with most of the store fronts facing the exterior of the building. Much of the existing store front area is glass to provide a display area for customers passing by the exterior of the shopping center as well as in the mall. This single-story construction and exterior glass contributes to a high heat loss due to a high ratio of exterior area to usable floor space and the poor insulating value of glass. Construction methods at the time the original shopping center was constructed were not oriented toward low energy use due to an adequate supply and low cost of energy at the time. Discussion with the Capital Hill Shopping Center architect, Richard Shope, indicates that the existing building is not energy efficient by today's standards.

Proposed improvements to the shopping center include renovation of the existing building as well as an expansion of the retail floor area. This renovation includes de-emphasizing the exterior display merchandising concept and facing the display areas toward the enclosed mall. The canopy area on the building exterior will be converted to an unheated storage area. This concept will be applied to approximately 60 percent of the exterior of the existing shopping center and will provide a dead space between the climate-controlled inside area and the weather outside. Much of the heat loss now occurring through the glass will also be eliminated.

A portion of the shopping center expansion will utilize two-story construction. This is more energy efficient than single-story construction due to a lower exterior area per square foot of floor



space. The new construction will also utilize current insulating standards and will be more energy efficient than the earlier construction. The mall will utilize skylights that will result in a passive solar gain during the day and will be insulated at night to avoid excessive heat loss.

The overall effect of these building improvements will be to reduce the per square foot energy use by an estimated 30 percent. However, the proposed expansion is expected to increase the floor area by about 90 percent. Therefore, the net result would be to increase the total energy use for the shopping center building by about one-third.

ENERGY USE FOR TRANSPORTATION

Capital Hill Shopping Center is located between two legs of a one-way couplet that is part of the major east-west arterial through Helena. As such, traffic volumes near the shopping center are near the maximum that occur anywhere in the city. Although figures that would demonstrate the number of vehicles that shop at Capital Hill as a part of a multi-purpose trip are not available, it is known from the Capital Hill Traffic and Utilities Impact Study that approximately 30 percent of the traffic on Eleventh and Prospect Avenues enters the shopping center parking lot. This would indicate that many of the trips to Capital Hill Shopping Center are multi-purpose, and that the proximity of the shopping center to the one-way couplet encourages multi-purpose trips, resulting in shorter trip lengths for shopping purposes.

The shopping center is also located somewhat strategically near the center of the southeast quadrant of Helena. The shopping center is therefore easily accessible to the residential areas to the south, north and east of the shopping center. Trip lengths to serve these areas are relatively short for a shopping center at this location.

Some discussion has also centered on capturing retail sales that purportedly go out of town due to inadequate shopping opportunities in Helena. If this is the case, expanding the shopping opportunities in Helena may decrease out-of-town shopping trips, but the validity of this energy savings, if any, would be difficult to quantify or demonstrate without a detailed investigation. It would be reasonable to expect, however, that at least a portion of the traffic generated by the shopping center would be redirected, instead of new trips.

The expansion of the shopping center will double the total energy consumption for transportation attributable to this shopping center if the assumption is made that the energy consumption is proportional to the trips generated. This may be misleading in that the services provided at this shopping center with the expansion may require less energy than if shoppers were required to travel to an alternate shopping area.

It is noted that the tight energy situation is creating more emphasis on smaller shopping centers that serve a more concentrated area, thereby requiring shorter trips and using less energy for transportation. It is expected that energy will continue to be in short supply, and that energy efficiency in shopping centers will be a major consideration in their design and evaluation in the future. Proximity to a shopping center may also promote no or low-energy transportation modes



such as bicycles or motorcycles.

Comparison of this shopping center location with other possible locations in Helena would subjectively indicate that this location is desirable from the standpoint of energy consumption. There are few other locations in the city that would require shorter trip lengths to provide these services to a particular area of the city, or where shoppers could combine their shopping trips with other trips to conserve transportation costs.

ENERGY FOR CONSTRUCTION

The existing shopping center has a sizable commitment in materials and construction. This investment is not being used to its fullest extent with the vacancy of the Albertson's Food Store. The owners and developers of the shopping center foresee further deterioration if the shopping center is not improved and expanded due to both the anticipated competition of additional shopping centers in Helena and the lack of a retail "anchor" that will draw shoppers to the shopping center. The effect of not having an "anchor" for the shopping center was demonstrated in the "Traffic and Utilities Impact Analysis" where it was shown that trip generation rates dropped from 45 trips per 1000 S.F. with Albertson's Food Store in operation to 40 trips per 1000 S.F. with Albertson's vacant.

If further decreases in business activity do occur it is possible that this investment in materials and construction could further decline in value and use. Salvaging the existing investment to the extent possible with expansion of the shopping center on the existing site would require less energy than constructing the same facility on a new site.



AIR QUALITY

AIR QUALITY BUREAU COMMENTS

To assess the general effects of the proposed shopping center expansion on air quality, the Air Quality Bureau of the Montana Department of Health and Environmental Sciences was requested to comment on major impacts on air quality. The Air Quality Bureau was very cooperative and responded with a letter within a short time period. A copy of the letter containing their comments is shown on the following page.

SUMMARY

In general, the effect on air quality due to the shopping center expansion will not be considered a major impact. It would, of course, be expected that auto generated pollutants would increase as travel increases (disregarding technological advances in pollution control devices and vehicles obtaining better mileage for the amount of fuel consumed). However, an unknown quantity is that at least a portion of the traffic would be expected to be redirected instead of additional, as discussed earlier in this report. That portion of traffic that is redirected would not add to the auto pollutants currently being generated. In summary, while the shopping center expansion would be expected to contribute in some manner to air quality degradation, it would not be considered significant in relation to the total pollutants currently being generated.



AIR QUALITY BUREAU
Cogswell Building
(406) 449-3454

November 27, 1979

Robert Peccia & Associates
One North Last Chance Gulch
Helena, MT 59601

Dear Mr. Peccia:

You have requested that the Air Quality Bureau comment on what effects the expansion of the Capital Hill Shopping Center will have on air quality.

In response to your request we were able to give only a cursory review of the project because of time constraints.

1. The additional traffic volumes expected will generate pollutants such as carbon monoxide, nitrogen oxides and smaller amounts of particulates and sulfur compounds. There are other pollutants generated by automobiles in minute amounts. These amounts are obviously in addition to what are already there.

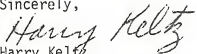
2. What the exact effect of these additional pollutants will have on air quality is not known since the pollutants are difficult to quantify because we do not know (a) the age of the vehicles involved; (b) type of vehicle (truck, car, van etc.) (c) the number of each.

3. There are emission factors in use today which estimate the amount of emissions which can be attributed to driving; however, the accuracy of those factors is somewhat questionable.

4. It is not expected that present air quality standards will be compromised by the additional traffic volumes anticipated, but as mentioned previously there will be some air quality degradation, the effects of which cannot be accurately quantified. However, the additional traffic volumes expected are not anticipated to have a major impact on air quality.

I regret the qualification of my remarks, but in the absence of actual measured data it is the best we can do.

Sincerely,


Harry Kelso,
Environmental Engineer



CHAPTER IX

NOISE

NOISE LEVELS

Noise levels were calculated for both the existing traffic volumes on Eleventh and Prospects and for anticipated future traffic. The Federal Highway Administration's "Highway Traffic Noise Prediction Model" was used for a hypothetical location approximately one block (400 feet) from the arterial streets, and the results checked and confirmed using the U.S. Department of Housing and Urban Development's "Noise Assessment Guidelines".

Traffic used was 1198 vehicles per hour for current traffic flow (occurring just east of Sanders Street) for current traffic and 1577 vehicles per hour for future traffic flow. Traffic composition was assumed to be two percent heavy trucks and three percent medium trucks. The 400-foot distance (120 meters) was used so that the effects on residential neighborhoods one block on either side of the arterials could be evaluated.

SUMMARY

For the hypothetical location chosen, the noise levels were calculated to be 55.2 decibels for current traffic and 56.2 decibels for projected traffic. These computations are based on the worst condition assuming a "hard site" (sound reflected from a hard surface), a constant speed of about 30 mph and no barriers. Both of these figures fall in the "Normally Acceptable" categories established by HUD.

It is noted that the additional traffic generated by the shopping center increases the noise level by less than two percent for the conditions assumed. Under different assumptions, of course, the results would vary with the difference becoming more pronounced at locations closer to the arterial street. It is also noted that these computations are for a hypothetical site and are not applicable in all cases. For a particular site the specific conditions of that site would have to be used to obtain a more accurate prediction on noise levels.

On the basis of this information it does not appear that the residential areas occurring at least one block from Eleventh and Prospect would be significantly impacted by noise from the increased traffic resulting from the shopping center expansion.

A check at a distance of about one-half block from the arterial indicates that the noise level would be very near a normally unacceptable range, and that noise barriers or land uses other than residential should be considered for these areas. Site specific studies, of course, should be done for any particular site.



CAPITAL INTERCHANGE AND INTERSTATE 15

PHYSICAL DESCRIPTION

The Capital Interchange with Interstate 15 is a partial diamond interchange and a partial cloverleaf interchange. All legs of the interchange except for the East Helena to Butte and Great Falls to East Helena movements operate under free flow conditions. A restricting factor on the operation of the interchange is the short weaving section coincident to the Helena to Great Falls on-ramp and the Butte to Helena off-ramp. On this section, off-ramp traffic and on-ramp traffic are required to merge and weave in a relatively short distance. To accomplish this maneuver, the traffic must slow down considerably, particularly during peak traffic flow. This restriction and the intersection of the ramps on the west side of the interchange with Eleventh and Prospect Avenues control the capacity of the interchange.

EXISTING TRAFFIC VOLUMES

Existing traffic volumes for the Capital Interchange with Interstate 15 were obtained from Phil Colbert of the Planning and Research Bureau of the Department of Highways. These traffic volumes were obtained from machine counts done in 1979 and included U.S. 12 and I-15 on all sides of the interchange and all of the interchange ramps.

The existing traffic counts are shown in Figure 3.

OPERATION OF INTERCHANGE

The free-flowing ramps are operating at a very high service level and are not anywhere near capacity. Although a detailed capacity analysis was not done for the interchange, rough preliminary calculations indicate that the free-flowing ramps are operating at less than 20 percent of capacity.

The short weave length for the Butte to Helena off-ramp and the Helena to Great Falls on-ramp was reviewed with criteria contained in the Highway Capacity Manual. Although the weave section is shorter than recommended lengths, the traffic volumes do not present a capacity problem.

Turning movement counts were taken by the Department of Highways on the west intersection of the ramps with Eleventh and Prospect. These counts indicate that most of the traffic is destined for Helena following the free-flow ramp lanes. About 25 percent of the west off-ramp traffic does turn left, crossing westbound traffic from East Helena and creating a conflict. During the traffic count period, the Department of Highways also noted a number of evasive maneuvers indicating driver uncertainty and accident potential. Although detailed capability calculations were not done, it is estimated that this intersection is operating at less than half of capacity.



SUMMARY

The Capital Interchange does have some unusual design and operating characteristics that restrict the smooth operation of the interchange. However, the interchange has sufficient capability to accommodate the expected 30 percent increase in traffic volume that would be generated by the expansion of the Capital Hill Shopping Center. This traffic increase would result in a low to moderate increase in traffic congestion and a slightly reduced level of service.



CAPITAL INTERCHANGE WITH INTERSTATE 15

-1978 AVERAGE DAILY TRAFFIC-

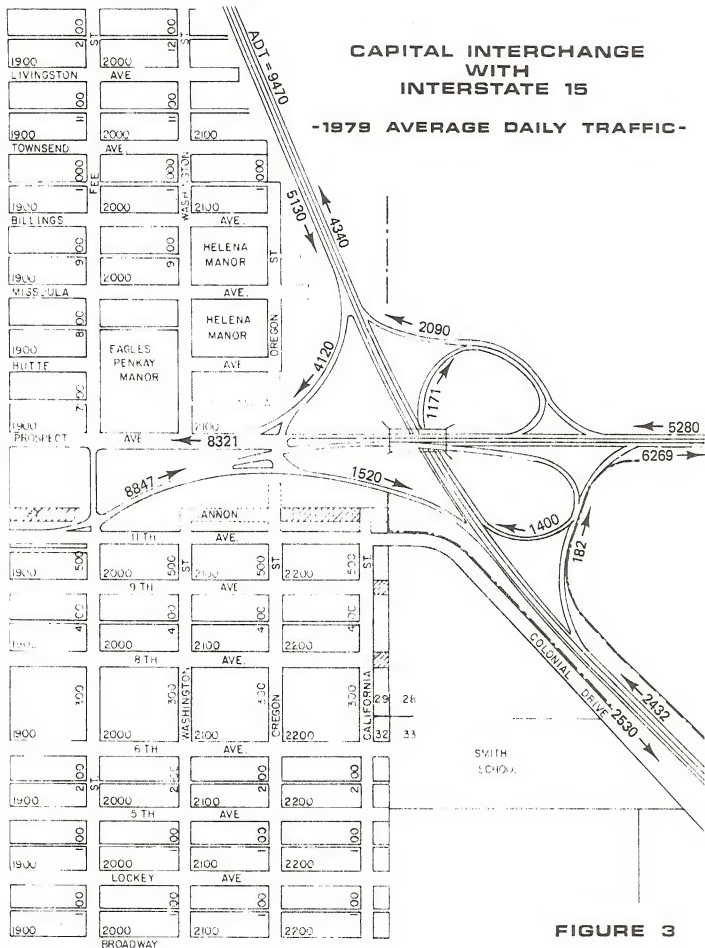
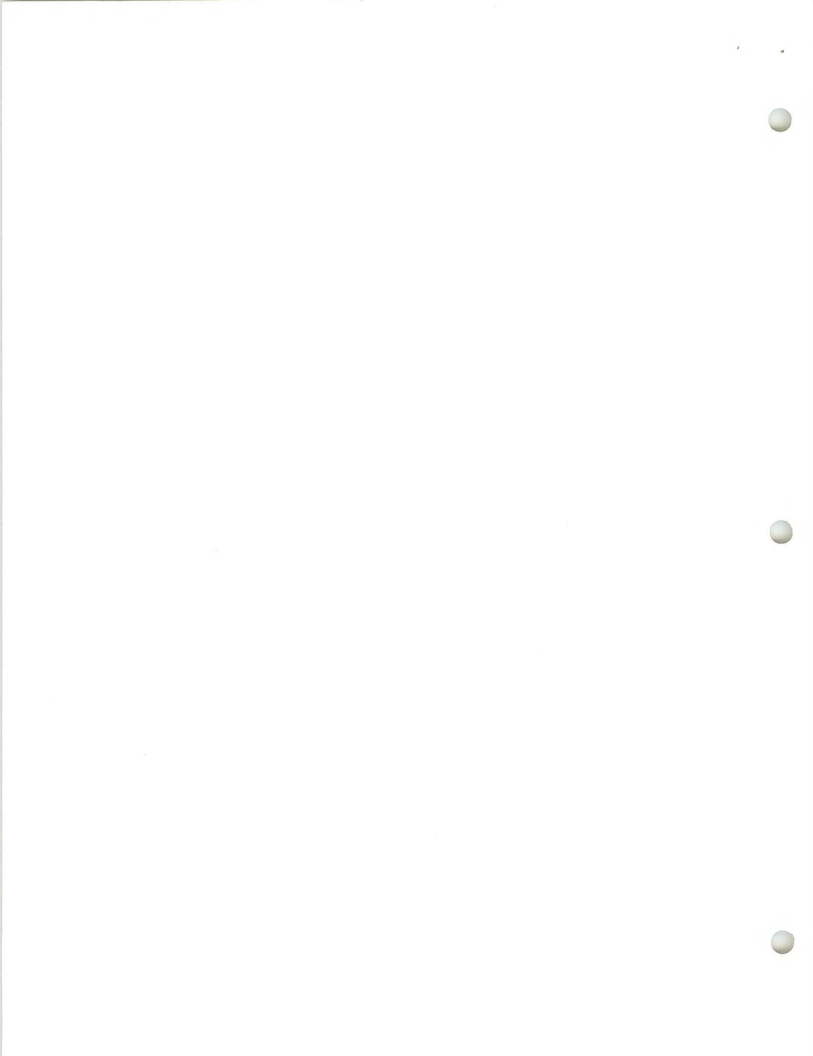


FIGURE 3



Appendix C

Comments Received From Steve Brown, Representing
Hal Wheat, owner of Hal Wheat Building

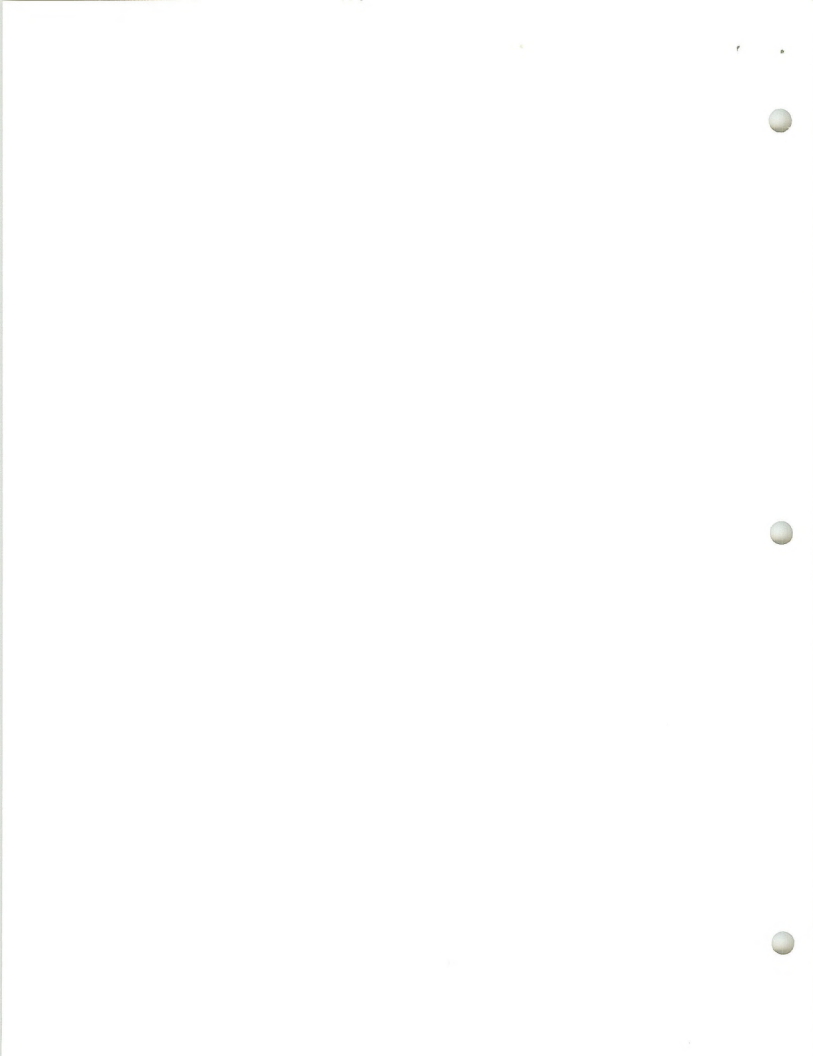


Impact of Capital Hill Shopping Center
Expansion on the Hal Wheat Property, 1400 Eleventh
Avenue.

PROJECT DESCRIPTION: Concept "1" -
Clark Financial Corporation, Salt Lake City,
proposes to expand the Capital Hill Shopping Center
from 120,600 square feet of floor area to 230,560
square feet. The major expansion would be to the
west of the vacant Albertsons store and would
involve the area bounded by Roberts Street on
the West, 11th Avenue on the South, Oakes Street
on the East and Prospect Avenue on the North.
Sanders Street would be closed from 11th Avenue
to Prospect Avenue.

Concept "2" - This proposal would increase
the floor area to 165,355 square feet and the
bowling alley property would not be acquired.

HAL WHEAT PROPERTY: The Hal Wheat
property is located on the Northeast corner of
the intersection of 11th Avenue and Roberts Street.
There are 27 parking spaces provided for tenant
and customer parking. Two 26 foot driveways located
on Roberts Street, 40 feet and 84 feet from its
intersection with 11th Avenue providing access
to the parking area.



Building access is provided by a main entrance on the East side of the building with minor entrances on the West and North sides of the building.

TRAFFIC IMPACT: Recommended improvements for Concept "1" that would have a direct effect on the Hal Wheat property are:

1. Signalization of the Roberts Street and 11th Avenue and Roberts Street and Prospect Avenue intersections.
2. Widening of Roberts Street to 40 feet.
3. Construction of a driveway access to the shopping center from Roberts Street.
4. Extension of shopping center parking into areas adjacent to the Wheat property.

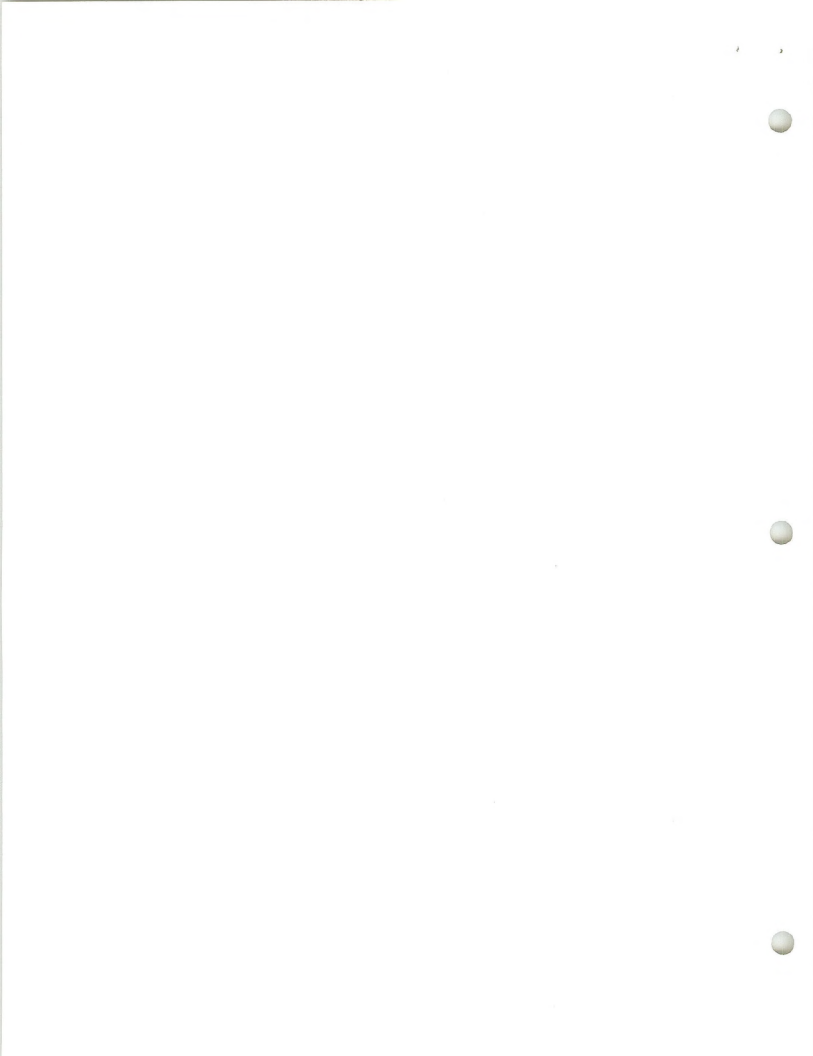
ROBERTS STREET SIGNALIZATION: This improvement will have the greatest impact on the Hal Wheat property. Vehicles backed up in the southbound lane of Roberts Street at 11th Avenue will make egress from the Wheat Building parking lot into that lane virtually impossible during peak hours. The peak hour occurs between 4:30 and 5:30 P.M., however, there are also peaking conditions between 7 A.M. and 9 A.M. and 12 noon to 1 P.M.

During peak hour, 67 percent (140 vph) on the South approach at Roberts Street and 11th Avenue will be turning left while 61 percent (84

vph) of the northbound traffic will be going straight through the intersection. This conflict will cause considerable backup in the Southbound lane of Roberts. Even though the South approach of Roberts Street is widened to provide a left turn bay, vehicles will back up closing the southbound exits from the Wheat Building. Because of this backup, entrance into the Wheat Building parking lot from the Southbound lane of Roberts Street would cause further congestion at the intersection. The following sketch shows the two movements that would be severely affected by signalization and increased traffic volumes on Roberts Street at 11th Avenue.

RECOMMENDATIONS: The following recommendations are based on the foregoing analyses:

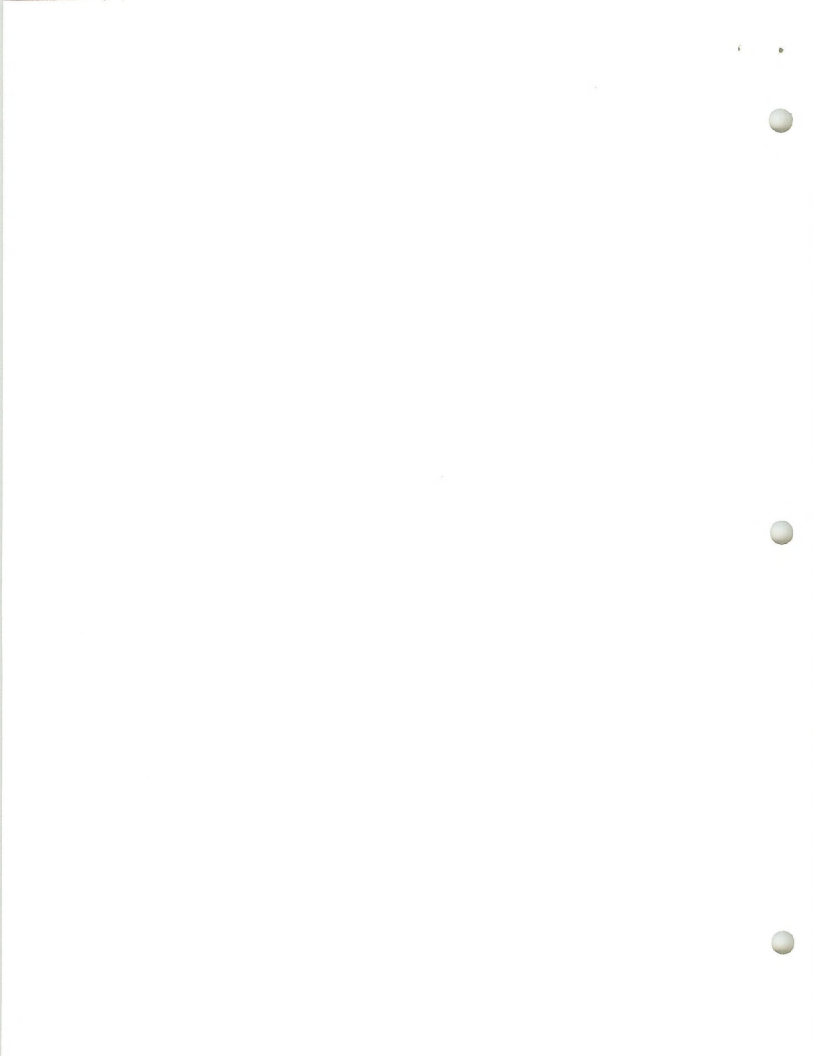
- 1.) Integrate Wheat Building Parking into Shopping Center Parking Plan - due to the proximity of the Wheat Building access drives to the proposed signalized intersection at Roberts Street and 11th Avenue, these drives should be closed for functional and safety purposes. Access to the Wheat Building property should be provided from the shopping center parking area. Parking

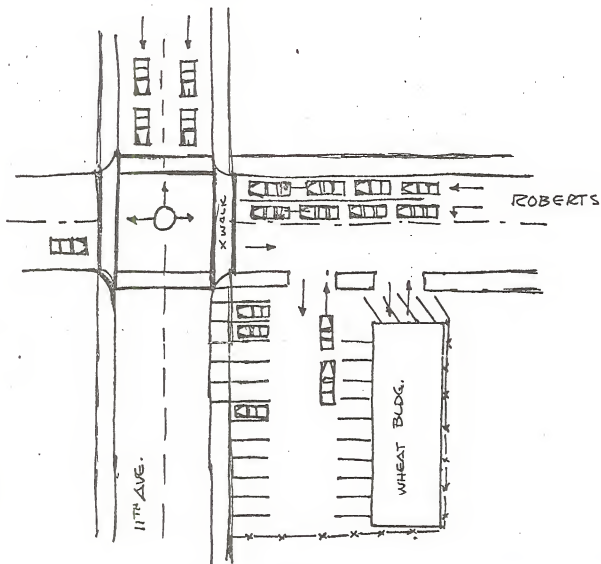


adjacent to the Wheat Building should be designed to provide tenant and customer parking. The main entrance to the Wheat Building should be reoriented to maximize the convenience of the parking to building access.

2. Provide Left Turn Bays: Left turn bays should be provided on Roberts Street at: 11th Avenue, the shopping center entrance/exit and Prospect Avenue.

3. Widen Roberts Street - The Peccia and Associates report recommends widening Roberts Street. If it is necessary to take right-of-way from the Wheat property, four parking spaces on the west side of the building will be lost. Compensating spaces should be provided in the shopping center lot.





THIS SKETCH SHOWS GRAPHICALLY THE CONGESTION THAT WOULD EXIST AT THE WHEAT BLDG. ACCESS POINTS DURING PEAK HOURS.

